

THE VICTIMS FROM HINKLEY, CA 92347 TO LOCAL FBI FIELD OFFICE  
FBI Los Angeles Suite 1700, FOB 11000 Wilshire Blvd., Los Angeles, California  
90024-3672 (310) 477-6565 Attn: Terry Wade, Special Agent  
[san.frankisco@ic.fbi.gov](mailto:san.frankisco@ic.fbi.gov) [FBIvictimassistance@ic.fbi.gov](mailto:FBIvictimassistance@ic.fbi.gov) [foiparequest@ic.fbi.gov](mailto:foiparequest@ic.fbi.gov)

## **REQUEST FOR IMMEDIATE INVESTIGATION BY FBI**

By the Victims from the Town of Hinkley, CA 92347, Contact [REDACTED] one of the Victims, at  
Tel (760) 678-4708 Email: [REDACTED]

On June 23, 2015, the Deputy Sheriff Mr. Bonde, County of San Bernardino, California, took the complaints of several Victims from the town of Hinkley, CA 92347 and thereafter consulting with the Chief of the Department, and the FBI Agents, stated that "the Sheriffs' Jurisdictional authorities are now in the hands of FBI, and therefore all information of criminal nature, all communications by the Victims, must be directed to FBI".

### **THEREFORE, THE VICTIMS RISES AND REPORTS ACTS, ALLEGED AS CRIMINAL**

The Victims from the town of Hinkley, CA 92347, will no longer tolerate the acts, alleged as criminal/ felony, causing massive illnesses, diseases and wrongful death to the Victims, names per attached hereto List, including but not limited to conceal of facts' acts by the following entity and Governmental Agencies, acting in concert, inclusive per attached hereto "VICTIMS BASIS FOR COMPLAINT":

- A. WHITE COLOR CRIME
- B. PUBLIC CORRUPTION
- C. COLOR OF LAW ABUSES
- D. TITLE 18, U.S.C., SECTION 241 CONSPIRACY AGAINST RIGHTS
- E. TITLE 18, U.S.C. SECTION 242 DEPRIVATION OF RIGHTS UNDER COLOR OF LAW
- F. TITLE 18, U.S.C. SECTION 245 FEDERALLY PROTECTED ACTIVITIES

### **SUMMARY**

The Victims from the town of Hinkley, CA 92347, nearly 100 victims, must be protected under the Federal Protected Activities, from the most sophisticated White Color Crimers, Public Corruption and Color of Law Abuses, by alleged herein as the perpetrators:

1. Pacific Gas and Electric Company (PG&E), a California corporation (on legal grounds a corporation is a person);
2. State of California Lahontan Regional Water Quality Control Board;
3. California State Water Resources Control Board
4. Cal / EPA Enforcement (Diane Trujillo)

5. Castellón & Funderburk, LLP, an Attorney for Pacific Gas and Electric Company (PG&E)
6. Hon. David Cohn, Judge, Superior Court County of San Bernardino, California
7. ET AL. 1 through 100, inclusive.

INSTANCES, JUST IN BRIEF:

- A. State of California Lahontan Regional Water Quality Control Board received a check for Four Million Dollars (\$4,000,000.00) from Pacific Gas and Electric Company (PG&E), for alleged as a totally ~~incomprehensive~~, vague and ambiguous and fictitious as a "junk science" study of the poisoned drinking and for all intensive purposes ground drinking water in aquifers beneath the town of Hinkley, California 92347. A study not meaningful at all, but just to protect PG&E from further investigation and prosecution for poisoning the drinking and for all other intensive purposes ground drinking water within the aquifers beneath the town of Hinkley, CA 92347 with the PG&E's byproducts Arsenic and Uranium.
- B. Concealment of Fact, a criminal offense, a felony, has occurred, and the \$ 4 million is a bribe.
- C. Acting in concert, Castellón & Funderburk and Hon. Judge Cohn are further shielding PG&E from prosecution.
- D. Cal/EPA has refused to undertake the investigation task of poisoned drinking and for all other intensive purposes ground waters within the many aquifers, virtually beneath the entire town of Hinkley, CA 92347.
- E. All others, acting in concert, will be disclosed by the following volume of information, pending submittal via mail (hard copies), to FBI.

THE VICTIMS WILL SUBMIT TO FBI THE VOLUME CONTAINING ALL EVIDENTIARY EXHIBITS, ALLEGATIONS, POINTS AND AUTHORITIES, AND ALL OTHER PERTINENT INFORMATION, BY JUNE 26, 2015, CONSTRUED AS AN EXTREMELY VITAL INFORMATION, ENABLING FBI TO PERFORM THE INVESTIGATION'S ACT AND ALL OTHER ACTS, ACCORDINGLY.

THIS INITIAL, VIA ELECTRONIC MAIL, SUBMITTAL WILL BE DISSEMINATED TO OTHER GOVERNMENTAL AGENCIES, PER ATTACHED HERTO MAILING LIST.

FBI MUST CONSIDER THE URGENCY OF THE SOUGHT INVESTIGATION, SINCE THE VICTIMS ARE GETTING ILL BY THE DAY AND MANY ARE JUST DYING BY USING THE POISONED DRINKING WATER BY PG&E, POISONED WITH ARSENIC AND URANIUM.

\_\_\_\_\_s\_\_\_\_\_ Signed by Victims, per attached hereto list.

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## SECOND REQUEST FOR IMMEDIATE INVESTIGATION BY FBI

By the Victims from the Town of Hinkley, CA 92347, Contact [REDACTED] one of the Victims, at Tel (760) 678-4708 Email: [REDACTED] Date of Request: June 25, 2015

On June 24, 2015, [REDACTED] did postponed going back to his places in Nevada, awaiting arrival of the Deputy Sheriff Mr. R. Moore, County of San Bernardino Sheriff's station, due to 911 call for attempted infiltration into [REDACTED] relative's property and illegal depositing of document by PG&E's runner into the [REDACTED] relative's US Mail box. ([REDACTED] s domicile are two states).

The document / paper, illegally served, was "PACIFIC GAS AND ELECTRIC COMPANY'S AMENDED MEMORANDUM OF POINTS AND AUTHORITIES REGARDING THE PLAINTIFF'S RIGHT TO DISMISS AN ACTION WHEN DISPOSITIVE MOTIONS ARE PENDING".

Such amended paper has removed any references, highly incriminating the State of California Lahontan Regional Water Quality Control Board, most probably due to calls made from State of California officials to the PG&E's attorney Castellon and Funderburk, to remove such from that paper.

Furthermore, PG&E's attorney Castellon and Funderburk have made mockery out of the court system, by serving such paper not two court days prior to hearing sought by the presiding judge David Cohn. Such hearing is to be June 25, 2015 thereafter [REDACTED] case was dismissed. (Illegal Acts)

There are certain missteps made by presiding judge Cohen, who reasserted his enormous power to allow continuation of the case thereafter properly dismissed cases. **[Alleged Prejudicial and Bias Acts]**

Such missteps were unscrupulously used by the attorneys for PG&E, Castellon and Funderburk, further alleged as "Color of Law Abuses" and unscrupulously misrepresented (fraudulently) to the Court.

All papers and documents, encompassing the alleged "Color of Law Abuses" (fraudulently misrepresented to the Court), will be mailed to FBI, on or before June 26, 2015.

The following allegations, construed as "Color of Law Abuses" (fraudulently misrepresented to the Court) are stated herein, in summary, and such acts are further construed as highly sophisticated tactical ploys by the attorneys for PG&E, attempted to circumvent laws and regulations, which not only has made mockery out of the judicial system, but are prima facie examples of highly corrupted color of law abuses, and such acts are respectfully requested to be urgently investigated by FBI:

1. Thereafter, not only [REDACTED] case but all 34 other cases of the In Pro Per Plaintiffs were properly dismissed, the presiding judge David Cohn, most likely influenced by the attorney's for PG&E, hereinafter the ("ESQs"), has, by Minutes Order, allow the ESQs to further unjustifiably keep burdening the Superior Court County of San Bernardino, Department S37, hereinafter the ("Court"),

by papers containing "Color of Law Abuses", thus since such were unscrupulously misrepresented, further construed as fraudulent, has caused the Victims to seek from FBI full investigation of such illegal acts by ESQs. (There were volume of information previously submitted to the Supreme Court of California Justices, The Honorable Leondra R. Kruger and The Honorable Joanne B. O'Donnell, Committee on Judicial Ethics Opinions.)

2. On June 5, 2015, the relatives of the In Pro per Plaintiffs, most of which domicile for long time in another states, other than California and in other county other than San Bernardino, (most of the Plaintiffs' relatives), ~~when~~ witnessing the "Color of Law Abuses" alleged to have occurred in the Court, most of which relatives did previously resided in Hinkley, CA 92347 and are currently suffering illnesses and diseases as a result thereof previously using drinking water poisoned with Hexavalent Chromium, become frustrated with what is transpiring with this Court.
3. On June 17, 2015, those relatives of the 35 In Pro Per Plaintiffs, who never filed lawsuit against Pacific Gas and Electric Company hereinafter ("PG&E"), thereafter the In Pro Per Plaintiffs filed final "Notice of Dismissal, did sent NOTICE OF INTENT TO FILE LAWSUIT in the respective jurisdiction and venue, other than California, to Attn: Hyun Park, Esq., General Counsel for Pacific Gas and Electric Company (PG&E).
4. THEREFORE, the attorneys for PG&E Castellon and Funderburk, in their amended paper of memorandum of points and authorities, **has misrepresented (lied) to the Court that the In Pro Per Plaintiffs were using "tactical ploy" and "forum shopping", which is absolutely not true.**
5. The In Pro Per Plaintiffs noticed that the presiding judge was against them", ("Color of Law Abuses"), and decision to voluntary dismiss their cases, has nothing to do with **"tactical ploy" and "forum shopping"**, since not the In Pro Per Plaintiffs will be suing again PG&E, but their relatives.
6. Such coordinated attack against the In Pro ~~per Plaintiffs~~ was alleged to also be as a direct result the inevitable disclosure of all wrongful acts committed by the State of California Lahontan Regional Water Quality Control Board, hereinafter the ("Board"), particularly in shielding PG&E from investigation and prosecution, including but not limited to:
  - (a) The Board, knowing very well, based upon many evidentiary exhibits, that virtually all aquifers beneath the town of Hinkley, CA 92347 were poisoned with the PG&E's byproducts Arsenic and Uranium, way over the legal limits, did not do anything meaningful to commence the required by law investigation. (The \$4 million check from PG&E to the Board, speaks on behalf of).
  - (b) The reason for the demanded investigation of all acts by the Board, the PG&E's ESQs and the presiding judge must be investigated and disclosed base upon disclosure's laws.
7. The **In Pro Per Plaintiffs did honestly dismissed their cases, by marking the box Dismissal of the entire action and crossing out the box Others Dismissal due to diversity jurisdiction.**
8. THEREFORE, the attorneys for PG&E Castellon and Funderburk, in their amended paper of memorandum of points and authorities, **has misrepresented (lied) to the Court that the In Pro Per Plaintiffs were requesting dismissal based upon diversity jurisdiction.** (Such lies are nothing less than ("Color of Law Abuses"), and FBI must take appropriate actions, accordingly.

All papers and evidentiary exhibits compiled by the In Pro Per Plaintiffs and by their relatives, will be transmitted via mail to FBI. (Copies of this and other communications sent to: per the Mailing List) (Signature by this Victim, is among the attached hereto "VICTIMS FROM HINKLEY, CA")

# VICTIMS FROM HINKLEY, CA 92347

NO.	Victim's Name	Signature or Signature on Behalf of	Victim's Mailing Address
1	Personal Privacy 6	Personal Privacy 6	

# Personal Privacy 6

# Personal Privacy 6

# Personal Privacy 6



# Personal Privacy 6

# Personal Privacy 6

# Personal Privacy 6

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## MAILING LIST

<p>California Environmental Protection Agency Cal/EPA Law Enforcement and Counsel Office 1001 "I" Street Sacramento, California 95814</p>	<p>Hon. Dianne Feinstein, U.S. Senator SAN FRANCISCO OFFICE One Point Street, Suite 2450 San Francisco, CA 94104</p>
<p>Office of Environmental Health Hazard Assessment (OEHHA) Prop 65 ARSENIC Attn: Cynthia Oshita, (Disclosure) P.O. Box 4010 Sacramento, California 95812</p>	<p>Hon. Barbara Boxer, U.S. Senator U.S. Senate Committee on Environment 112 Hart Senate Office Building Washington, D.C. 20510</p>
<p>Hon. Jerry Hill, Chair California Senate EQC Oversight State Capitol, Room 2205 Sacramento, California 95814</p>	<p>Hon. Nancy Patricia D'Alesandro Pelosi U. S. Congresswoman United States House of Representatives 233 Cannon H.O.B. Washington, DC 20515</p>
<p>Hon. Luis A. Alejo, Assembly Member Environmental Safety and Toxic Materials Committee 1020 N Street, Room 171 Sacramento, California 95814</p>	<p>Hon. Paul Cook, U.S. Congressman United States House of Representatives 1222 Longworth House Office Building Washington, D.C. 20515-0508</p>
<p>Attn: Gary Edward Tavetian, Esq. Supervising Deputy Attorney General OFFICE OF THE ATTORNEY GENERAL, DOJ Natural Resources Law Section 300 S. Spring Street, #5000 Los Angeles, California 90013</p>	<p>Attn: Julie Jordan; Dan Drazan; Tracy Back US EPA Criminal Investigation Division (CID) Los Angeles Resident Office 600 Wilshire Blvd., Suite 900 Los Angeles, CA 90017</p>
<p>Ross Sevy, District Director Office of Jay Obernolte, Assemblyman 5900 Smokr Tree Street, Suite 125 Hesperia, California 92345</p>	<p>Attn: Deborah L. Harris; W. Benjamin Fisherow U.S. DOJ / Environmental Enforcement Environment and Natural Resources Division 950 Pennsylvania Avenue, NW Washington, DC 20530-0001</p>
<p>Proposition 65 Enforcement Reporting Attention: Prop 65 Coordinator 1515 Clay Street, Suite 2000 Post Office Box 70550 Oakland, California 94612-0550</p>	<p>Attn: Bill L. Lewis; Kendrick D. Williams; Terry Wade; Joseph O. Johns; Patrick Bohrer FBI Investigation Division 11000 Wilshire Boulevard, Suite 1700 Los Angeles, CA 90024</p>

California Attorney General Office, DOJ Proposition 65 Enforcement Reporting 1515 Clay Street, Suite 2000 Oakland, California 94612-0550	OGWDW - 4601M Office of Ground Water and Drinking Water U. S. EPA Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
Diane Trujilo, Enforcement Agent CAL / EPA ENFORCEMENT 1001 "T" Street Sacramento, CA 95814	The Honorable Dianne Feinstein, Senator United States Senate Committee on the Judiciary 224 Dirksen Senate Office Building, Washington, D.C. 20510-6050
Clark Hansen, Chief Deputy District Attorney <b>SAN BERNARDINO COUNTY DISTRICT ATTORNEY</b> BUREAU OF INVESTIGATION - ENVIRONMENTAL CRIMES 14455 Civic Dr., Suite 300 Victorville, CA 92392	

The Victims from Hinkley, CA 92347, just read the quoted herein below by United States Federal Bureau of Investigation, Special Agent Patrick Bohrer and other statements made by Federal Bureau of Investigation (FBI):

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**FBI Los Angeles Suite 1700, FOB 11000 Wilshire Blvd., Los Angeles, California 90024-3672 (310) 477-6565 Attn: Terry Wade, Special Agent**

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**"Chemistry Mission**

The Chemistry Unit conducts timely, high-quality chemical and metallurgical analyses on evidence, reports findings, provides testimony in court, assists in crime scene investigations, and provides advanced training to law enforcement agencies to support the investigative priorities of the FBI and the law enforcement community."

"When you think of FBI agents, you probably don't picture them flashing their badges and digging for clues in the name of the environment. But we do investigate those who abuse or endanger our nation's natural resources. And have for years".

"Specifically, we focus our efforts on the following .... priorities:

- Knowing endangerment—when the crime puts someone in danger;
- Patterned flagrant violators—companies that shrug off ....
- Government abuse—because the government must obey laws, too".

"Making sure that toxic chemicals don't harm people and the environment is serious business. And why we make it our business to help protect America's natural resources".

**"Combat major white-collar crime**

Fraud—the art of deliberate deception for unlawful gain—is as old as history; the term "white-collar crime" was reportedly coined in 1939 and has since become synonymous with the full range of frauds committed by business and government professionals. Today's financial criminals and con artists are more savvy and sophisticated than ever, engineering everything from complex stock and health care frauds and intellectual property rip-offs.

We have more than a dozen squads dedicated to fighting white-collar crime in the Los Angeles region. These squads focus on financial institution fraud, health care fraud, mortgage fraud, securities fraud, cross border fraud, and other more general types of fraud."

**"Public Corruption**

**Why It's Our #1 Criminal Priority**

Public corruption is a breach of trust by federal, state, or local officials—often with the help of private sector accomplices. It's also the FBI's top criminal investigative priority. To explain why the Bureau takes public corruption so seriously and how we investigate, we talked with Special Agent Patrick Bohrer, assistant section chief of our Public Corruption/Civil Rights program at FBI Headquarters.

**Question: Why is public corruption so high on the FBI's list of investigative priorities?**

**Answer:** Because of its impact. Corrupt public officials undermine our country's national security, our overall safety, the public trust, and confidence in the U.S. government, wasting billions of dollars along the way. This corruption can tarnish virtually every aspect of society". "Or corrupt state legislators could cast deciding votes on a bill providing funding or other benefits to a company for the wrong reasons."

**Q: Can you describe the kinds of public corruption that the FBI investigates?**

**A:** It really runs the gamut. Bribery is the most common. ...

**Q: Where do you find this corruption?**

**A:** Just about everywhere—at the federal, state, and local levels throughout the country. And I should point out, the vast majority of our country's public officials are honest and work hard to improve the lives of the American people. But a small number make decisions for the wrong reasons—usually, to line their own pockets or those of friends and family. These people can be found—and have been found—in legislatures, courts, city halls, law enforcement departments, school and zoning boards, government agencies of all kinds (including those that regulate elections and transportation), and even companies that do business with government.

**Q: How does the FBI investigate public corruption?**

**A:** We're in a unique position to investigate allegations of public corruption. Our lawful use of sophisticated investigative tools and methods—like undercover operations, court-authorized electronic surveillance, and informants—often gives us a front-row seat to witness the actual exchange of bribe money or a backroom handshake that seals an illegal deal...and enough evidence to send the culprits to prison. But we have plenty of help. We often work in conjunction with the inspector general offices from various federal agencies, as well as with our state and local partners. And we depend greatly on assistance from the public. So let me end by saying, if anyone out there has any information about potential wrongdoing by a public official, please submit a tip online or contact your local FBI field office. Your help really makes a difference."

**"Color of Law Abuses**

U.S. law enforcement officers and other officials like judges, prosecutors, and security guards have been given tremendous power by local, state, and federal government agencies—authority they must have to enforce the law and ensure justice in our country. These powers include the authority to detain and arrest suspects, to search and seize property, to bring criminal charges, to make rulings in court, and to use deadly force in certain situations.

Preventing abuse of this authority, however, is equally necessary to the health of our nation's democracy. That's why it's a federal crime for anyone acting under "color of law" willfully to deprive or conspire to deprive a person of a right protected by the Constitution or U.S. law. "Color of law" simply means that the person is using authority given to him or her by a local, state, or federal government agency.

**Failure to keep from harm:** The public counts on its law enforcement officials to protect local communities. If it's shown that an official willfully failed to keep an individual from harm, that official could be in violation of the color of law statute.

**Filing a Complaint**

To file a color of law complaint, contact your local FBI office by telephone, in writing, or in person. The following information should be provided:



- All identifying information for the victim(s);
- As much identifying information as possible for the subject(s), including position, rank, and agency employed;
- Date and time of incident;
- Location of incident;
- Names, addresses, and telephone numbers of any witness(es);
- A complete chronology of events; and
- Any report numbers and charges with respect to the incident.

You may also contact the United States Attorney's Office in your district or send a written complaint to:

Assistant Attorney General  
Civil Rights Division  
Criminal Section  
950 Pennsylvania Avenue, Northwest  
Washington, DC 20530

FBI investigations vary in length. Once our investigation is complete, we forward the findings to the U.S. Attorney's Office within the local jurisdiction and to the U.S. Department of Justice in Washington, D.C., which decide whether or not to proceed toward prosecution and handle any prosecutions that follow.

#### **Report Civil Rights Violations**

- **File a Report with Your Local FBI Office"**

#### **"Title 18, U.S.C., Section 241**

##### **Conspiracy Against Rights**

This statute makes it unlawful for two or more persons to conspire to injure, oppress, threaten, or intimidate any person of any state, territory or district in the free exercise or enjoyment of any right or privilege secured to him/her by the Constitution or the laws of the United States, (or because of his/her having exercised the same).

It further makes it unlawful for two or more persons to go in disguise on the highway or on the premises of another with the intent to prevent or hinder his/her free exercise or enjoyment of any rights so secured.

Punishment varies from a fine or imprisonment of up to ten years, or both; and if death results, or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse or an attempt to commit aggravated sexual abuse, or an attempt to kill, shall be fined under this title or imprisoned for any term of years, or for life, or may be sentenced to death."

#### **"Title 18, U.S.C., Section 242**

##### **Deprivation of Rights Under Color of Law**

This statute makes it a crime for any person acting under color of law, statute, ordinance, regulation, or custom to willfully deprive or cause to be deprived from any person those rights, privileges, or immunities secured or protected by the Constitution and laws of the U.S.

This law further prohibits a person acting under color of law, statute, ordinance, regulation or custom to willfully subject or cause to be subjected any person to different punishments, pains, or penalties, than those prescribed for punishment of citizens on account of such person being an alien or by reason of his/her color or race.

Acts under "color of any law" include acts not only done by federal, state, or local officials within the bounds or limits of their lawful authority, but also acts done without and beyond the bounds of their lawful authority; provided that, in order for unlawful acts of any official to be done under "color of any law," the unlawful acts must be done while such official is purporting or pretending to act in the performance of his/her official duties. This definition includes, in addition to law enforcement officials, individuals such as Mayors, Council persons, Judges, Nursing Home Proprietors, Security Guards, etc., persons who are bound by laws, statutes ordinances, or customs.

Punishment varies from a fine or imprisonment of up to one year, or both, and if bodily injury results or if such acts include the use, attempted use, or threatened use of a dangerous weapon, explosives, or fire shall be fined or imprisoned up to ten years or both, and if death results, or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse or an attempt to commit aggravated sexual abuse, or an attempt to kill, shall be fined under this title, or imprisoned for any term of years or for life, or both, or may be sentenced to death."

#### **"Title 18, U.S.C., Section 245**

##### **Federally Protected Activities**

1) This statute prohibits willful injury, intimidation, or interference, or attempt to do so, by force or threat of force of any person or class of persons because of their activity as:

- a) A voter, or person qualifying to vote...;
- b) a participant in any benefit, service, privilege, program, facility, or activity provided or administered by the United States;
- c) an applicant for federal employment or an employee by the federal government;
- d) a juror or prospective juror in federal court; and
- e) a participant in any program or activity receiving Federal financial assistance.

2) Prohibits willful injury, intimidation, or interference or attempt to do so, by force or threat of force of any person because of race, color, religion, or national origin and because of his/her activity as:

- a) A student or applicant for admission to any public school or public college;
- b) a participant in any benefit, service, privilege, program, facility, or activity provided or administered by a state or local government;
- c) an applicant for private or state employment, private or state employee; a member or applicant for membership in any labor organization or hiring hall; or an applicant for employment through any employment agency, labor organization or hiring hall;
- d) a juror or prospective juror in state court;
- e) a traveler or user of any facility of interstate commerce or common carrier; or
- f) a patron of any public accommodation, including hotels, motels, restaurants, lunchrooms, bars, gas stations, theaters...or any other establishment which serves the public and which is principally engaged in selling food or beverages for consumption on the premises.

3) Prohibits interference by force or threat of force against any person because he/she is or has been, or in order to intimidate such person or any other person or class of persons from participating or affording others the opportunity or protection to so participate, or lawfully aiding or encouraging other persons to participate in any of the benefits or activities listed in items (1) and (2), above without discrimination as to race, color, religion, or national origin. Punishment varies from a fine or imprisonment of up to one year, or both, and if bodily injury results or if such acts include the use, attempted use, or threatened use of a dangerous weapon, explosives, or fire shall be fined or imprisoned up to ten years or both, and if death results or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse or an attempt to commit aggravated sexual abuse, or an attempt to kill, shall be subject to imprisonment for any term of years or for life or may be sentenced to death."

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**Q: How does the FBI investigate public corruption?**

**A:** We're in a unique position to investigate allegations of public corruption. Our lawful use of sophisticated investigative tools and methods—like undercover operations, court-authorized electronic surveillance, and informants—often gives us a front-row seat to witness the actual exchange of bribe money or a backroom handshake that seals an illegal deal...and enough evidence to send the culprits to prison. But we have plenty of help. We often work in conjunction with the inspector general offices from various federal agencies, as well as with our state and local partners. And we depend greatly on assistance from the public. So let me end by saying, if anyone out there has any information about potential wrongdoing by a public official, please submit a tip online or contact your local FBI field office. Your help really makes a difference."

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- As much identifying information as possible for the subject(s), including position, rank, and agency employed;
- Date and time of incident;
- Location of incident;
- Names, addresses, and telephone numbers of any witness(es);
- A complete chronology of events; and
- Any report numbers and charges with respect to the incident.

You may also contact the United States Attorney's Office in your district or send a written complaint to:

Assistant Attorney General

Civil Rights Division

Criminal Section

950 Pennsylvania Avenue, Northwest

Washington, DC 20530

FBI investigations vary in length. Once our investigation is complete, we forward the findings to the U.S. Attorney's Office within the local jurisdiction and to the U.S. Department of Justice in Washington, D.C., which decide whether or not to proceed toward prosecution and handle any prosecutions that follow.

**Report Civil Rights Violations**

- **File a Report with Your Local FBI Office"**

**THE PEOPLE FROM HINKLEY**  
HINKLEY, CALIFORNIA 92347

Temporary Mailing Address  
[REDACTED]  
Barstow, CA 92347  
Temporary Telephone  
(760) 678-4708

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May 30, 2015

**SAN BERNARDINO COUNTY DISTRICT ATTORNEY**  
BUREAU OF INVESTIGATION – ENVIRONMENTAL CRIMES  
14455 Civic Dr., Suite 300  
Victorville, CA 92392

**ENVIRONMENTAL CRIMES INVESTIGATION REQUEST**  
**PRESSING CHARGES NOTIFICATION**

Attn: Clark Hansen, Chief Deputy District Attorney

THE PEOPLE RISES, those People, per the Signatures Pages attached hereto, and based upon Gary Tavention, Esq. Supervising Deputy Attorney General, Natural Resources Division, California DOJ, who has sent a letter, stating to inform the District Attorney about Pacific Gas and Electric Company acts, request of the followings:

1. THE PEOPLE request assistance by the San Bernardino County District Attorney to commence environmental crimes investigation, based upon Points and Authorities:  
*"The district attorney also prosecutes those complex crimes which harm the environment. Environmental crimes involve statutes and regulations designed to protect the environment as well as the health and welfare of the citizens. These types of cases can include violations of laws regulating the handling, storage and disposal of hazardous waste and materials as well as air and water pollution. The district attorney often collaborates with local, state and federal government agencies to address environmental issues, and investigate those issues that are crimes. We will prosecute to the fullest those who gain unfair advantage over their competitors and hurt the environment by not following the rules and laws that are adhered to by the legitimate businesses. As with the consumer protection cases, the remedies sought can be had through either criminal cases where people can be sentenced to jail or prison, or civil lawsuits. The remedies for environmental harm can include cleanup of the hazardous substances, financial penalties and fines, and court orders for protective measures designed to prevent the environmental harm from occurring again"*

**Environmental Crime has occurred and is currently occurring in the town of Hinkley, CA 92347 by:**

Pacific Gas and Electric Company, Hinkley, CA 92347 operations, that are alleged, based upon recently confirmed fact, of poisoning the ground drinking water within the aquifers beneath the real properties of those per Signatures Pages Victims, with Arsenic and Uranium over the maximum legal limits, construed as poisoning act, causing illnesses, diseases and wrongful death to those Victims per the Signatures Pages.

**2. NOTIFICATION**

Those Victims, per the Signatures Pages, are now, as of this date, **pressing charges against:**  
**PACIFIC GAS AND ELECTRIC COMPANY**, a California Corporation (Corporation is a person)

THE PEOPLE are ready to execute all necessary tasks and documents in furtherance of justice.

# **EVIDENTIARY EXHIBITS**

**IN SUPPORT THEREOF**

**REITERATED DEMANDS**

**FOR INVESTIGATION OF**

**DRINKING WATER WITHIN THE**

**AQUIFERS BENEATH THE ENTIRE**

**TOWN OF HINKLEY, CA 92347**

**POISONED WITH THE TOXIC AND**

**DISOLVED ARSENIC AND URANIUM**

**(BYPRODUCTS FROM PG&E'S OPERATIONS)**

EXHIBIT “1”



[REDACTED]  
[REDACTED]  
Foss, OK 73647

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

## NOTICE OF INTENT TO FILE LAWSUIT

JURISDICTION:  
UNITED STATES DISTRICT COURT  
VENUE:  
DISTRICT IS TO BE DETERMINED

Notice Dated: June 18, 2015

Ex-Parte Plaintiff:  
Tonja Dishmon; Craig Dishmon  
Ex-Parte Defendant: Pacific Gas and Electric  
Company, a California corporation

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED] the undersigned per the attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed any lawsuits against Pacific Gas and Electric Company (PG&E) and I, by an assignment and delegation from [REDACTED] and/or from [REDACTED] an ex-parte who had recently dismissed the entire action without prejudice against Pacific Gas and Electric Company, intend to file, in the proper venue, either individually, or as a Class Member in a Class Action, a lawsuit against Pacific Gas and Electric Company (PG&E), based upon the following grounds:

1. The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, in the cumulative, did exceeded \$ 600,000, which includes: (a) vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the poisoned water rights, now assigned to me by the ex-parte, confirmed as minimum of \$ 100,000 (set precedence by PG&E's recent water rights purchase); (b) total economic loss sustained to the real property, as a direct result thereof poisoned drinking water within the aquifer beneath the ex-parte real property, for which I am the principal benefactor, amounting to in excess of \$250,000; (c) previously, I was in Hinkley, CA 92347 and now have sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases related to the poisoned drinking water with one, or more of the recently discovered primary toxic substances Arsenic and Uranium, in addition to with Hexavalent Chromium.
2. I am in the process to have domicile in a state other than California, and since Pacific Gas and Electric Company is a California corporation, I am qualified based upon the Complete Diversity Jurisdiction.
3. There could be other Federalism issues, including but not limited to Poisoned Federal Ground Drinking Water Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (CDWA), an act to safeguard the public drinking ground water within aquifers to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347 (not private wells at-issue, only the public aquifers beneath with over 25 connections), is currently under investigation, with laboratory results are pending from:  
(i) WECK Laboratory, City of Industry, CA (35 samples of poisoned aquifers at 35 locations) were initially submitted to: US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017;  
(ii) Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). 35 samples from 35 locations with C.O.C. submitted on June 15, 2015.

[REDACTED]  
[REDACTED]  
Pahrump, NV 89048

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT  
COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT  
PREJUDICE, PRIOR TO TRIAL AND PRIOR TO  
HEARINGS: By Party Litigant and Plaintiff: Nick  
Panchev.

Party Litigant and Defendant: Pacific Gas and Electric  
Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 800,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$450,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
[REDACTED]  
Clearlake, CA 95422

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Annette L. Airo.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED] intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 550,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$200,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
[REDACTED]  
Elsinore, UT 84724

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Lloyd K. Vinson; Barbara A. Vinson.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED] the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED] and [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 700,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$350,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
[REDACTED]  
Las Vegas, NV 89130

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Moises Toledo and Juliana Martinez.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

We, [REDACTED] and [REDACTED] the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). We, by an assignment and delegation from [REDACTED] and [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 850,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiffs, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath real property, for which we are the principal benefactors, amounting to in excess of \$250,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries to each victim, totaling \$500,000.

We are in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
[REDACTED]  
Hinkley, CA 92347

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Victor M. Suarez and Saray D. Ordaz.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED] the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED] and [REDACTED] intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 600,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$250,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
[REDACTED]  
Picayune, MS 39466

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: William Bolin and Carolyn Bolin.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED] and [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 600,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$250,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.



[REDACTED]  
[REDACTED]  
Newberry Springs, CA 92395

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Keith Hawes.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 750,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$400,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.



[REDACTED]  
[REDACTED]  
Hinkley, CA 92347

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff:

Columbia Garza and Martin Garza.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED] and [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 550,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$200,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
[REDACTED]  
San Diego, CA 92111

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Noel Corby.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED] intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 550,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$200,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
[REDACTED]  
Mesa, AZ 85207

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT  
COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT  
PREJUDICE, PRIOR TO TRIAL AND PRIOR TO  
HEARINGS: By Party Litigant and Plaintiff: Shirley  
Holcroft.

Party Litigant and Defendant: Pacific Gas and Electric  
Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

We, [REDACTED] and [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). We, by an assignment and delegation from [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 875,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiffs, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath real property, for which we are the principal benefactors, amounting to in excess of \$275,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries to each victim, totaling \$500,000.

We are in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
[REDACTED]  
Barstow, CA 92311

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Ronald Brown and Sandra Brown.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED] and [REDACTED] intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 650,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$300,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
Las Vegas, NV 89130

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Robert Richards and Olga Richards.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED] and [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 550,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$200,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
[REDACTED]  
Henderson, NV 89015

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Herbert Nethery and Yvonne Kirkpatrick.  
Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED] and [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 800,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$450,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.



[REDACTED]  
[REDACTED]  
Corona, CA 92882

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Tom Findley and Alta Finley.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED] and [REDACTED] intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 550,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$200,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
Farmington Hills, MI 48331

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT  
COURT  
VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT  
PREJUDICE, PRIOR TO TRIAL AND PRIOR TO  
HEARINGS: By Party Litigant and Plaintiff: Clell  
Courtney.

Party Litigant and Defendant: Pacific Gas and Electric  
Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 375,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase) demanded 50%, amounting to \$ 50,000;
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$75,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.



[REDACTED]  
Las Vegas, NV 89122

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Hennie Courtney.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 375,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase) demanded 50%, amounting to \$ 50,000;
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$75,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
Barstow, CA 92311

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Janet Schultz.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 500,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$150,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
[REDACTED]  
South East Snohomish, WA 98290

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Andrea Williams.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

We, [REDACTED]; [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). We, by an assignment and delegation from [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 800,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiffs, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath real property, for which we are the principal benefactors, amounting to in excess of \$200,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries to each victim, totaling \$500,000.

We are in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
[REDACTED]  
Pahrump, NV 89060

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Norman Halstead, Gary Halstead and Aquilla Frederick. Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED] and [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 800,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$550,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
Glendale, AZ 85302

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Robert Miller.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 550,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$200,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
[REDACTED]  
Barstow, CA 92311

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Charles Matthiesen.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 550,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$200,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.



[REDACTED]  
[REDACTED]  
Pahrump, NV 89048

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Candace Matthiesen.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 550,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$200,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
[REDACTED]  
Avondale, AZ 85323

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Agustin Carrera.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 800,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$450,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.



[REDACTED]  
[REDACTED]  
Sugar Land, TX 77498

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Aurang Zaib Khan.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

We, [REDACTED]; [REDACTED]; [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). We, by an assignment and delegation from [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 950,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiffs, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath real property, for which we are the principal benefactors, amounting to in excess of \$100,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries to each victim, totaling \$750,000.

We are in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
[REDACTED]  
Tucson, AZ 85713

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT  
COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT  
PREJUDICE, PRIOR TO TRIAL AND PRIOR TO  
HEARINGS: By Party Litigant and Plaintiff: John  
Ramirez.

Party Litigant and Defendant: Pacific Gas and Electric  
Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

We, [REDACTED]; [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). We, by an assignment and delegation from [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 800,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiffs, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath real property, for which we are the principal benefactors, amounting to in excess of \$200,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries to each victim, totaling \$500,000.

We are in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
[REDACTED]  
El Mirage, AZ 85335

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Richard Heiser.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 500,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$150,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
[REDACTED]  
[REDACTED]  
Mesa, AZ 85207

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Charles Jenkins.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

We, [REDACTED] and [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). We, by an assignment and delegation from [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 950,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiffs, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath real property, for which we are the principal benefactors, amounting to in excess of \$350,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries to each victim, totaling \$500,000.

We are in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
[REDACTED]  
RoseMead, CA 91770

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Ken Nitao.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 550,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$200,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
[REDACTED]  
Parker, AZ 85344

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Joel A. Christison.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 900,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$550,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.



[REDACTED]  
[REDACTED]  
Rosemead, CA 91770

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Oscar Urbina.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 500,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$150,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
[REDACTED]  
Barstow, CA 92311

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Gilberto Velazquez and Esperanza Velazquez.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED] and [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 600,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$250,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.



[REDACTED]  
[REDACTED]  
Albuquerque, NM 97112

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Matsue Matthiesen.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

We, [REDACTED] and [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). We, by an assignment and delegation from [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 700,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiffs, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath real property, for which we are the principal benefactors, amounting to in excess of \$100,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries to each victim, totaling \$500,000.

We are in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
[REDACTED]  
Mesa, AZ 85203

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Jose Ornelas and Rosalba Hernandez.  
Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED] and [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 500,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$150,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

[REDACTED]  
[REDACTED]  
Los Angeles, CA 90019

Hyun Park, Esq., General Counsel  
Pacific Gas and Electric Company (PG&E)  
77 Beale Street  
San Francisco, CA 94105

Notice Date: June 17, 2015

**NOTICE OF INTENT TO FILE LAWSUIT**

JURISDICTION: UNITED STATES DISTRICT COURT

VENUE: DISTRICT IS TO BE DETERMINED

DISMISSED LAWSUIT BY PLAINTIFF WITHOUT PREJUDICE, PRIOR TO TRIAL AND PRIOR TO HEARINGS: By Party Litigant and Plaintiff: Do Y. Kim.

Party Litigant and Defendant: Pacific Gas and Electric Company, a California corporation.

Attn: Hyun Park, Esq., General Counsel

I, [REDACTED], the undersigned, per attached hereto signatures pages of the VICTIMS FROM HINKLEY, CA 92347, has never filed lawsuit against Pacific Gas and Electric Company (PG&E). I, by an assignment and delegation from [REDACTED], intend to file, in the U.S. District Court, either individually, or as a Class Member in a Class Action, lawsuit against Pacific Gas and Electric Company, based upon the following grounds and COAs:

The amount of controversy exceeds \$ 75,000, which amount is the prerequisite minimum amount, set as qualifying amount, for cases to be filed in any United States District Court, and based upon evidentiary facts, in the cumulative, did exceed \$ 1,000,000, and the restitutions demanded in the U.S. District Court are to include:

- (1) For vindication of property rights with which Pacific Gas and Electric Company (PG&E) has interfered, including but not limited to the vindicated water rights interfered by PG&E, are now assigned to me by the Party Litigant and Plaintiff, confirmed at minimum of \$ 100,000 (per set precedence by PG&E's recent water rights purchase);
- (2) For total economic loss sustained to the real property, for total loss-of-use, and for total diminution in value, including costs to decontaminate, as a direct result thereof poisoned drinking water within the aquifer beneath the real property, for which I am the principal benefactor, amounting to in excess of \$650,000; and
- (3) For noneconomic loss due to previously being in Hinkley, CA 92347, with now sustained health damages, based upon recent discovery (within the past 90 days), of illnesses and/or deceases, caused by the poisoned drinking water in aquifers with one, or more of recently discovered primary toxic substances Arsenic and Uranium in aquifer's drinking water, in addition to with Hexavalent Chromium, and the restitution demanded is at the capped by California Legislature \$250,000 for medical injuries.

I am in the process to domicile in a state other than California. Pacific Gas and Electric Company is a California corporation. I will be qualified to file in the U.S. District Court, based upon **Complete Diversity Jurisdiction**.

There are other Federal Questions, within the causes of actions (COAs), including but not limited to the Poisoned Federal Ground Drinking Water's Aquifers with Arsenic and Uranium, in addition to with the historic Hexavalent Chromium, and under the United States Safe Drinking Water Act (SDWA), an act to safeguard the public drinking ground water within the public aquifers, to which more than 25 connections are made, being the case for the entire town of Hinkley, California 92347, is currently under investigation, with laboratory's results pending from:

WECK Laboratory, City of Industry, CA. Submitted were 35 samples from poisoned aquifers at 35 locations. Initially submitted to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Blvd., Suite 900, Los Angeles, CA 90017; and from Western Environmental Testing Laboratory, Las Vegas, NV (California Certified). Submitted were 35 samples from poisoned aquifers at 35 locations, on June 15, 2015.

**EXHIBIT “2”**

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10 Attorneys for Defendant Pacific Gas and Electric Company

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**SUPERIOR COURT OF CALIFORNIA**  
**COUNTY OF SAN BERNARDINO**

██████████, an individual and DOES, 1  
through 50, inclusive,

Plaintiffs,

vs.

PACIFIC GAS AND ELECTRIC  
COMPANY, a California Corporation; and  
DOES 1 through 50 inclusive,

Defendants.

Case No. CIVDS1416980  
Assigned for all purposes to:  
The Hon. David Cohn

**PACIFIC GAS AND ELECTRIC  
COMPANY'S MEMORANDUM OF  
POINTS AND AUTHORITIES  
REGARDING THE PLAINTIFF'S RIGHT  
TO DISMISS AN ACTION WHEN  
DISPOSITIVE MOTIONS ARE PENDING**

Date: June 25, 2015  
Time: 8:30 a.m.  
Dept.: S37

1 Pursuant to the Court's June 1, 2015 Order, Defendant Pacific Gas and Electric Company  
2 ("PG&E") hereby submits this memorandum of points and authorities regarding a plaintiff's right  
3 to voluntarily dismiss an action when a dispositive motion is pending. Pursuant to California  
4 law, the Court should deny Plaintiff [REDACTED] ("Plaintiff") request for dismissal without  
5 prejudice because dismissal pursuant to the demurrer is inevitable. Moreover, the filing of the  
6 request for dismissal is an improper tactical ploy that will not resolve this action and only serve  
7 to prejudice PG&E and further burden the Court system.

8 Based on the following discussion, PG&E requests that the Court deny Plaintiff's request  
9 for dismissal and proceed with the hearing on PG&E's demurrer and motion to strike. In  
10 addition, PG&E requests that the Court grant the demurrer and motion to strike in their entirety  
11 because they are unopposed.

#### 11 I. FACTUAL BACKGROUND

12 On May 1, 2015, Plaintiff filed the operative second amended complaint ("SAC") in this  
13 action. At a hearing before the Court on May 5, 2015, Judge Cohn addressed Plaintiff's SAC  
14 and indicated that there was sufficient basis to grant a demurrer to the SAC. Judge Cohn noted  
15 that the SAC was insufficient and contained improper material. See Declaration of Ruben A.  
16 Castellón ("Castellón Decl."), para 3.

17 Following the Court hearing, Nick Panchev, self-appointed spokesperson for all of the 35  
18 pro per cases pending before this Court, spoke with Ruben Castellón, counsel for PG&E. During  
19 this conversation [REDACTED] and informed him that the plaintiffs in each of the 35 pro per cases  
20 were considering dismissing these actions and filing them in federal Court pursuant to diversity  
21 jurisdiction. See Castellón Decl., para. 4.

22 In a letter to [REDACTED], dated May 27, 2015, the Lahontan Regional Water Quality Control  
23 Board ("Water Board") identified several communications made by [REDACTED] that took place on  
24 April 30, 2015 and May 4, 6, and 7, 2015. See Castellón Decl., para. 5. [REDACTED] letters and  
25 emails contained multiple statements regarding his intent to seek redress in federal court in states  
26 other than California. For example, in one communication to the Water Board, after identifying  
27 several employees of various state and local public and environmental health agencies, [REDACTED]  
28 states, "it could be ruled inappropriate for those officials to testify as an expert witness, or in any  
other capacities, before any United States District Court, in states other than the State of

1 California. (Many of [the pro per plaintiffs], per Signatures Pages, have, or are about to have  
2 their domicile in another state. (Complete Diversity Jurisdiction ... triggers new venue.)” See  
3 Castellón Decl., para. 6. In another communication, [REDACTED] declares “since there is no threat of  
4 litigation against the Water Board, and since there will be no litigation in any State of California  
5 Superior Courts, not only against the Water Board, but against PG&E (not in any Courts within  
6 State of California), (there is high probability that PG&E will be litigated in many US District  
7 Courts, in many States in the U.S. other than in the state of California).” See Castellón Decl.,  
8 para. 7.

9 On May 20, 2015 PG&E filed and served a demurrer to the SAC (“Demurrer”) and a  
10 motion to strike portions of the SAC (“MTS”). See Castellón Decl., para. 8. The Demurrer  
11 specifically requested dismissal of Plaintiff’s entire action with prejudice. *Id.* The Demurrer and  
12 MTS are currently set for hearing on June 25, 2015. *Id.*

13 On May 22, 2015, Plaintiff filed a request for dismissal without prejudice (“Request”).  
14 The Request states that Plaintiff seeks dismissal of PG&E “due to complete diversity  
15 jurisdiction.” See Castellón Decl., para. 9.

16 Around the time of the filing of the Plaintiff’s Request a number of the pro per plaintiffs  
17 began filing notices of change of address. See Castellón Decl., para. 10. These forms indicated  
18 that several of the plaintiffs now maintain addresses outside of the state of California. *Id.*

19 On June 1, 2015, the Court issued a minute order entitled “Further Order on Dismissed  
20 PG&E Cases” (“Minute Order”). In the Minute Order the Court stated the following:

21 The law is unclear whether plaintiff had an absolute right to dismiss an action  
22 when a dispositive motion is pending. ... In light of the uncertainty in the law, the  
23 Court will entertain argument on the issue at the scheduled hearing on 6/25/15 at  
24 8:30 a.m.

25 PG&E now submits this memorandum of points and authorities regarding Plaintiff’s right  
26 to dismiss this action when PG&E’s dispositive motions are pending.

## 27 **II. LEGAL ANALYSIS**

28 Plaintiff’s right to dismiss their action is based on section 581 of the California Code of  
Civil Procedure. It is clear that, while a plaintiff’s right to dismiss is generally upheld it is by no  
means absolute. The question of whether a plaintiff may dismiss an action when a dispositive  
motion is pending has been considered in a number of cases and the decision is generally based  
on the timing of the request in relation to the status of the motion. It is also clear that California

1 Court's will deny a plaintiff's request for dismissal when it is clear that the dismissal is a tactical  
2 ploy, including a plaintiff's attempt to avoid an inevitable ruling.

3 Here, the Plaintiff's conduct preceding the filing of the Request and the information  
4 contained within the Request make it clear that the dismissal is simply a tactical ploy. Plaintiff  
5 does not truly intend to dismiss the action but will seek to bring his claims in a forum that he  
6 believes offers a better chance of success. Meanwhile, PG&E has expending significant sums  
7 defending Plaintiff's claims already and will only be subjected to additional costs. Moreover,  
8 PG&E and the Court system will continue to be burdened by Plaintiff's claims. This is an  
improper outcome and Plaintiff's Request should be denied.

9 **A. Applicable Law**

10 California Code of Civil Procedure § 581 states that:

11 An action may be dismissed in any of the following instances:

12 (1) With or without prejudice, upon written request of the plaintiff to the clerk,  
13 filed with papers in the case, or by oral or written request to the court at any time  
before the actual commencement of trial, upon payment of the costs, if any.

Cal. Code. Civ. Proc. § 581

14 California cases hold that a plaintiff's right to dismiss the action without prejudice may  
15 be cut off where a dispositive motion is pending, before any ruling thereon, if the dismissal  
16 appears to be a tactical ploy. See *Hardbrodt v. Burke* (1996) 42 Cal.App.4<sup>th</sup> 168, 175 (request for  
17 dismissal without prejudice filed day before hearing on motion for terminating sanction in  
18 discovery dispute; *Cravens v. State Board of Equalization* (1997) 52 Cal.App.4<sup>th</sup> 253, 257  
19 (request for dismissal without prejudice filed after expiration of time to file opposition to motion  
for summary judgment); See also *Mary Morgan, Inc. v. Melzark* (1996) 49 Cal.App.4<sup>th</sup> 765, 770.

20 In the case *Wells v. Marina City Properties, Inc.*, 29 Cal.3d 781 (1981), the Court  
21 considered the issue of whether a plaintiff should be allowed to dismiss the case and refile in  
22 another Court after failing several attempts to amend his complaint to satisfy the Court that a  
23 cause of action was stated. The *Wells* Court held that "[t]o accept his present argument... would  
24 allow him to reassert the same allegations in still another complaint, seeking a more favorable  
25 ruling from another court, rather than to proceed in a more appropriate, expeditious and final  
26 course to appeal on the legal sufficiency of those allegations. The obvious consequence of such a  
27 statutory construction would be to prolong, rather than to terminate, lawsuits. It would not serve  
28 the orderly and timely disposition of civil litigation. No good reason appears why



1 encouragement should be given to such tactics, the effect of which is to expose the defendants to  
2 duplicative 'annoying and continuous litigation,' to burden our trial court with 'fruitless'  
3 proceedings, and to delay the ultimate resolution of the validity of the plaintiff's pleading."  
4 *Wells* at 788-789. The *Wells* Court continued, stating "[o]ur interpretation of Section 581 does  
5 not deny a plaintiff his day in court. It simply requires that he frame his allegations in order to  
6 state a cause of action; and if a plaintiff is unable to do so after an adequate and reasonable  
7 opportunity is afforded, he must proceed to a review of such legal determination by appeal, rather  
8 than seek another trial forum in which to reassert the same claims." *Id.*

9 In the case, *Law Offices of Andrew L. Ellis v. Yang*, 178 Cal. App. 4th 869 (Cal. App. 2d  
10 Dist. 2009), the Court noted that "[u]ntil recently, the cases have not presented a completely clear  
11 or cohesive test to describe which situations deprive plaintiffs of their right to voluntarily dismiss  
12 their cases, nor have the cases articulated a precise rule providing guidance in all circumstances.  
13 However, recent authority suggests parties are not permitted to voluntarily dismiss their actions  
14 ... when the procedural posture is such that it is inevitable the plaintiff will lose. After such  
15 occurrences, these cases hold that plaintiffs lose their right to voluntarily dismiss their case."  
16 *Yang*, at 8 [REDACTED]

17 **B. Plaintiff's Loss is Inevitable and, As Such, Plaintiff has Lost His Voluntary  
18 Right to Dismiss**

19 Based on the facts, Plaintiff's dismissal of the case is clearly an attempt to avoid the  
20 inevitable – that he will lose. Plaintiff has been the subject of a previous successful demurrer  
21 filed by [REDACTED]. During the Court hearing on PG&E's demurrer to the first amended complaint  
22 the Court stated that it would likely be open to granting a demurrer without leave to amend as to  
23 a second amended complaint if the second amended complaint was insufficient. PG&E has filed  
24 another demurrer as to Plaintiff's SAC and there is every indication that PG&E will once again  
25 be successful, including comments from the Court regarding the insufficiency of the SAC. Based  
26 on the foregoing, an order granting PG&E's demurrer to the SAC without leave to amend  
27 appears to be inevitable. Based on California law, when the procedural posture is such that it is  
28 inevitable the plaintiff will lose, such as it appears here, the plaintiff's right to voluntarily dismiss  
the case is cut off. As such, Plaintiff's Request should not be granted and the Court should allow  
PG&E to proceed with its demurrer and motion to strike regarding the SAC.

1           **C. Plaintiff's Request for Dismissal is a Tactical Ploy and Plaintiff Should Not**  
2           **be Permitted to Dismiss the Case**

3           It is clear from the facts that Plaintiff's dismissal is a tactical ploy. Plaintiff intends to  
4           dismiss his action in this Court because he has had unfavorable rulings against past iterations of  
5           his complaint and it is obvious that a similar ruling may be issued in relation to the operative  
6           complaint. Plaintiff does not seek a dismissal in a final resolution of his claims but intends to  
7           attempt to obtain recovery in another forum at the expense of PG&E.

8           The facts herein are much like the facts in *Wells, supra*. Plaintiff has had multiple  
9           opportunities to amend his complaint to state sufficient facts to support his causes of action.  
10          Plaintiff continues to make the same missteps in relation to his pleadings and, based thereon,  
11          PG&E has filed a demurrer to Plaintiff's SAC. There is every indication that PG&E will once  
12          again be successful, including comments from the Court regarding the insufficiency of the SAC.  
13          It also appears that there is a likelihood that the Court may grant PG&E's demurrer without leave  
14          to amend. Plaintiff is aware of these facts and is now attempting to seek redress in another court  
15          through the act of forum shopping, a practice that is disapproved of by both state and federal  
16          courts<sup>1</sup>.

17          Plaintiff's intent to forum shop is established by the facts. [REDACTED] expressly stated that  
18          the pro per plaintiffs intended to dismiss the case in order to file it in federal Court. In Panchev's  
19          correspondence with the Water Board, he has made several representations about filing in federal  
20          court, including a statement that the pro per plaintiffs will be filing federal complaints in multiple  
21          states against PG&E. Based on his statements to the Water Board, [REDACTED] forum shopping is  
22          motivated by his desire to exclude the Water Board and the testimony of potential witnesses that  
23          he believes would hurt his case from participation in further actions against PG&E.

24          If Plaintiff wishes to bring a case in federal Court absent any federal claims he must  
25          establish diversity jurisdiction.<sup>2</sup> Following [REDACTED] statements several of the pro per plaintiffs  
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<sup>1</sup> California law holds that Courts should not allow forum shopping. See *Henderson v. Superior Court*, 77 Cal. App. 3d 583, 593-594 (Cal. App. 2d Dist. 1978); *Appalachian Ins. Company v. Superior Court* (1984) 162 Cal.App.3d 427, 438; *Delfosse v. C.A.C.I., Inc.-Federal* (1990) 218 Cal.App.3d 683, 691. Also, in *Hanna v. Plummer*, 380 U.S. 460, the United States Supreme Court held that one of the aims of the *Erie* rule was to discourage forum-shopping. See *Hanna* at 468.

<sup>2</sup> Diversity jurisdiction allows federal courts to hear controversies "between Citizens of different States." U.S. Constitution, Art. III, § 2. "The district Courts shall have original jurisdiction of all civil actions where the matter in

1 filed notices indicating that they now maintain new addresses in states other than California.  
2 Furthermore, included in requests for dismissal filed by most of the pro per plaintiffs is the  
3 statement that dismissal is due because of "complete diversity jurisdiction." Plaintiff's ploy  
4 could not be more transparent. Plaintiff has no intention of resolving his claims through  
5 dismissal and, instead, intends to seek recovery in a forum he believes may be more favorable.

6 As the *Wells* Court indicated, motives such as the Plaintiff's should not be permitted to  
7 succeed. If Plaintiff's Request is granted it will only prolong, rather than terminate, the actions  
8 against PG&E. It also would not serve the orderly and timely disposition of civil litigation. The  
9 effect of granting the Request would prejudice PG&E by exposing it to duplicative, costly,  
10 annoying and continuous litigation, burden the court system with fruitless proceedings, and delay  
11 the ultimate resolution of the validity of the Plaintiff's pleading. Plaintiff has other options  
12 available to him, such as appealing any order regarding PG&E's demurrer. Therefore, Plaintiff's  
13 request for dismissal should be denied because it is a tactical ploy that will only burden and  
14 prejudice PG&E with further litigation.

15 **D. There is a Likelihood that Plaintiff Will Seek to Return His Claims to State**  
16 **Court in the Future**

17 There is a possibility that Plaintiff's attempt to seek redress in federal court will fail and  
18 Plaintiff will, once again, attempt to assert his claims against PG&E in state Court. Based on  
19 statements from [REDACTED] it appears the pro per plaintiffs intend to bring claims in federal Courts  
20 in several states. In pursuit of this end, Plaintiffs in 28 of the pro per cases have since filed  
21 notices of change of address. Only 22 of these notices identify addresses outside of California.  
22 This attempt to manufacture jurisdiction will only fail. [REDACTED]

23 Federal law clearly holds that it is improper to attempt to manufacture diversity  
24 jurisdiction. "There must be an actual, not pretended, change of domicile; in other words, the  
25 removal must be a real one, *animo manendi*, and not merely ostensible." *Morris v. Gilmer*, 129  
26 U.S. 315, 328 (internal citation omitted). The burden will fall to the plaintiffs that have noticed  
27 out of state addresses to prove that the new addresses are their place of domicile in order to  
28 establish that they are a citizen of that state. The party seeking to invoke federal jurisdiction  
bears the burden of demonstrating that the requirements of diversity are met. See *Pollution*

controversy exceeds the sum or value of \$75,000, and is between ...citizens of different States." 28 U.S.C. §

1 *Control Indus. Of America, Inc. v. Van Gundy*, 21 F.3d 152, 155. "A person's state citizenship is  
2 determined by their state of domicile, not their state of residence. A person is domiciled in a  
3 location where he or she has established a fixed habitation or abode in a particular place, and  
4 [intends] to remain there permanently or indefinitely." *Lew v. Moss*, (9<sup>th</sup> Cir. 1986) 797 F.2d  
5 747, 749-750 (internal quotations omitted). It has further been held that "domicile is generally a  
6 compound of physical presence plus an intention to make a certain definite place one's  
7 permanent abode." *Weible v. United State*, (9<sup>th</sup> Cir. 1957) 244 F.2d 158, 163. Based on the hasty  
8 manner in which the pro per plaintiffs served their notices of change of address, following  
9 [REDACTED] statements to Castellon and the Water Board, and the claims of diversity jurisdiction  
10 made in the requests for dismissal, it is unlikely that the pro per plaintiffs who have indicated a  
11 new state of residence will be able to establish that they are, in fact, citizens of those states.

12 Based on the foregoing, there is a high likelihood that Plaintiff's ploy to seek redress in  
13 federal court will be defeated. If this happens, Plaintiff may, at some point in the future, attempt  
14 to refile his action against PG&E in state court. This result must not be permitted. As such,  
15 PG&E requests that the Court deny the Request and hear PG&E's demurrer and motion to strike.

### 16 **III. PG&E'S DEMURRER AND MOTION TO STRIKE SHOULD BE GRANTED**

17 As discussed above, Plaintiff's Request should be denied. PG&E Requests that the Court  
18 hear its Demurrer and MTS. PG&E's Demurrer and MTS ~~statements~~ are unopposed and, therefore,  
19 they should be granted on the grounds stated therein.

20 PG&E's Demurrer is also supported by the Water Board's May 27, 2015 letter to  
21 [REDACTED] See Castellon Decl., para. 5. In the letter the Water Board discusses the basis of  
22 Plaintiff's claims at length. The Water Board notes that it has never established that PG&E is  
23 responsible for the presence of arsenic or uranium in Hinkley's ground water. It is stated that  
24 these constituents are present in the Hinkley area in a higher concentration than is usually found.  
25 Moreover, the Water Board notes that movement of these constituents could be caused by  
26 agricultural practices that have been employed for decades in the Hinkley area by entities other  
27 than PG&E.

1 The Water Board also contradicts the basis of Plaintiff's claims related to the  
2 concealment of facts by identifying multiple documents produced by PG&E, dating back to 2012,  
3 as well as multiple locations where additional documents are publicly available.

4 The Water Board's representations provide further support for PG&E's position that  
5 Plaintiff's claims are factually insufficient. Based on the lack of factual support for Plaintiff's  
6 claims, dismissal without leave to amend is appropriate.

#### 7 IV. CONCLUSION

8 California law holds that a plaintiff does not maintain a right to dismiss an action when a  
9 loss is inevitable or when the request for dismissal is a tactical ploy. Both of these elements are  
10 present here. Plaintiff understands that a dismissal without leave to amend pursuant to PG&E's  
11 demurrer is inevitable and Plaintiff is attempting to circumvent that inevitability. In addition,  
12 Plaintiff's Request is made as a tactical ploy. Plaintiff wishes to dismiss this action and seek  
13 another forum in which to bring claims against PG&E. Working in conjunction with the other  
14 pro per plaintiffs, Plaintiff intends to bring multiple actions against PG&E in federal courts in  
15 several states outside of California. Plaintiff is motivated to seek a forum outside California by a  
16 stated desire to exclude the Water Board and other witnesses from future actions against PG&E  
17 in other states. Plaintiff's Request will not serve to complete this action but will only place  
18 further undue prejudice, burden and expense on PG&E and additional strain on the judicial  
19 system. California law prohibits such an outcome.

20 Based on the foregoing, PG&E requests that the Court deny the Request and proceed with  
21 the hearing on PG&E's Demurrer and MTS. Moreover, because the Demurrer and Motion to  
22 strike are unopposed, PG&E request that the Court grant both motions in their entirety and  
23 dismiss Plaintiff's SAC without leave to amend.

24 Dated: June 22, 2015

CASTELLÓN & FUNDERBURK LLP

25 By: 

Ruben A. Castellón

Alastair F. Hamblin

Attorneys for Pacific Gas and Electric  
Company



**EXHIBIT “3”**





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10 Attorneys for Defendant Pacific Gas and Electric Company

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**SUPERIOR COURT OF CALIFORNIA**  
**COUNTY OF SAN BERNARDINO**

██████████, an individual and DOES, 1  
through 50, inclusive,

Plaintiffs,

vs.

PACIFIC GAS AND ELECTRIC  
COMPANY, a California Corporation; and  
DOES 1 through 50 inclusive,

Defendants.

**Case No. CIVDS1416980**  
Assigned for all purposes to:  
The Hon. David Cohn

**PACIFIC GAS AND ELECTRIC  
COMPANY'S AMENDED  
MEMORANDUM OF POINTS AND  
AUTHORITIES REGARDING THE  
PLAINTIFF'S RIGHT TO DISMISS AN  
ACTION WHEN DISPOSITIVE  
MOTIONS ARE PENDING**

Date: June 25, 2015  
Time: 8:30 a.m.  
Dept.: S37

1  
2 Pursuant to the Court's June 1, 2015 Order, Defendant Pacific Gas and Electric Company  
3 ("PG&E") hereby submits this memorandum of points and authorities regarding a plaintiff's right  
4 to voluntarily dismiss an action when a dispositive motion is pending. Pursuant to California  
5 law, the Plaintiff, [REDACTED] ("Plaintiff") right to voluntarily dismiss this action is cut-off  
6 because the Plaintiff's request for dismissal without prejudice ("Request") is a tactical ploy that  
7 will not resolve this action. The facts, show that Plaintiff is engaged in the act of forum  
8 shopping. Case law holds that attempting to dismiss a case as a tactical ploy is improper and,  
9 specifically, when a Plaintiff requests a dismissal to engage in forum shopping it imposes an  
10 unnecessary burden on the defendant and the Court system and improperly prejudices the  
11 defendant.

12 To avoid undue prejudice, PG&E requests that if the Court confirms the dismissal of this  
13 action pursuant to Plaintiff's Request that the dismissal be **with prejudice**. In the alternative,  
14 PG&E requests that the Court proceed with the hearing on the demurrer and motion to strike  
15 Plaintiff's operative second amended complaint ("SAC") before rendering a decision regarding  
16 dismissal.

#### 16 I. FACTUAL BACKGROUND

17 On May 1, 2015, Plaintiff filed the SAC in this action. On May 20, 2015 PG&E filed and  
18 served a demurrer to the SAC ("Demurrer") and a motion to strike portions of the SAC ("MTS").  
19 See Castellón Decl., para. 3. The Demurrer specifically requested dismissal of Plaintiff's entire  
20 action with prejudice. *Id.* The Demurrer and MTS are currently set for hearing on June 25,  
21 2015. *Id.*

22 On May 22, 2015, Plaintiff filed the Request. The Request states that Plaintiff seeks  
23 dismissal of PG&E "due to complete diversity jurisdiction." Plaintiffs in all of the pro per cases  
24 pending in this Court also filed requests for dismissal and with the exception of two, they all  
25 cited "complete diversity jurisdiction" as the basis for their request for dismissal. Further,  
26 around the time of the filing of the Plaintiff's Request all but one of the pro per plaintiffs filed  
27  
28

1 notices of change of address. These forms indicate that several of the plaintiffs now maintain  
2 addresses outside of the state of California.

3 On June 1, 2015, the Court issued a minute order entitled "Further Order on Dismissed  
4 PG&E Cases" ("Minute Order"). In the Minute Order the Court stated the following:

5 The law is unclear whether plaintiff had an absolute right to dismiss an action  
6 when a dispositive motion is pending. ... In light of the uncertainty in the law, the  
7 Court will entertain argument on the issue at the scheduled hearing on 6/25/15 at  
8 8:30 a.m.

9 PG&E now submits this memorandum of points and authorities regarding Plaintiff's right  
10 to dismiss this action when PG&E's dispositive motions are pending.

11 **II. IF THE COURT ALLOWS PLAINTIFF TO DISMISS THE CASE, PG&E**  
12 **REQUESTS THAT THE DISMISSAL BE WITH PREJUDICE**

13 Plaintiff's right to dismiss their action is based on section 581 of the California Code of  
14 Civil Procedure. It is clear that, while a plaintiff's right to dismiss is generally upheld it is not  
15 absolute. There are several cases where California Courts have denied a plaintiff's request for  
16 dismissal when it is clear that the dismissal is a tactical ploy, including situations when a plaintiff  
17 attempts to dismiss a case with the intent to file it in another court.

18 Here, the contents of the requests to dismiss and notices of change of address filed by all  
19 of the pro per plaintiffs makes it clear that the requested dismissal is simply a tactical ploy.  
20 Plaintiff does not truly intend to dismiss the action but will seek to bring his claims in another  
21 forum. Meanwhile, PG&E has expending significant sums defending Plaintiff's claims already  
22 and, if dismissal is granted without prejudice PG&E will only be subjected to additional costs  
23 and undue prejudice. Moreover, PG&E and the Court system will continue to be burdened by  
24 Plaintiff's claims. This is an improper outcome. In order to avoid undue prejudice, PG&E  
25 requests that any dismissal be granted with prejudice.

26 **A. Applicable Law**

27 California Code of Civil Procedure § 581 states that:

28 An action may be dismissed in any of the following instances:

(1) With or without prejudice, upon written request of the plaintiff to the clerk,  
filed with papers in the case, or by oral or written request to the court at any time  
before the actual commencement of trial, upon payment of the costs, if any.  
Cal. Code. Civ. Proc. § 581

1 California cases hold that a plaintiff's right to dismiss the action without prejudice may  
2 be cut off where a dispositive motion is pending, before any ruling thereon, if the dismissal  
3 appears to be a tactical ploy. See *Hardbrodt v. Burke* (1996) 42 Cal.App.4<sup>th</sup> 168, 175 (request  
4 for dismissal without prejudice filed day before hearing on motion for terminating sanction in  
5 discovery dispute); *Cravens v. State Board of Equalization* (1997) 52 Cal.App.4<sup>th</sup> 253, 257  
6 (request for dismissal without prejudice filed after expiration of time to file opposition to motion  
7 for summary judgment); See also *Mary Morgan, Inc. v. Melzark* (1996) 49 Cal.App.4<sup>th</sup> 765, 770  
8 (voluntary dismissal not permitted after summary judgment hearing commenced and was  
continued to permit discovery).

9 In the case *Wells v. Marina City Properties, Inc.*, 29 Cal.3d 781 (1981), the Court  
10 considered the issue of whether a plaintiff should be allowed to dismiss the case and refile in  
11 another Court after failing several attempts to amend his complaint to satisfy the Court that a  
12 cause of action was stated. The *Wells* Court held that "[t]o accept his present argument... would  
13 allow him to reassert the same allegations in still another complaint, seeking a more favorable  
14 ruling from another court, rather than to proceed in a more appropriate, expeditious and final  
15 course to appeal on the legal sufficiency of those allegations. The obvious consequence of such a  
16 statutory construction would be to prolong, rather than to terminate, lawsuits. It would not serve  
17 the orderly and timely disposition of civil litigation. No good reason appears why  
18 encouragement should be given to such tactics, the effect of which is to expose the defendants to  
19 duplicative 'annoying and continuous litigation,' to burden our trial court with 'fruitless'  
20 proceedings, and to delay the ultimate resolution of the validity of the plaintiff's pleading."  
21 *Wells* at 788-789. The *Wells* Court continued, stating "[o]ur interpretation of Section 581 does  
22 not deny a plaintiff his day in court. It simply requires that he frame his allegations in order to  
23 state a cause of action; and if a plaintiff is unable to do so after an adequate and reasonable  
24 opportunity is afforded, he must proceed to a review of such legal determination by appeal, rather  
25 than seek another trial forum in which to reassert the same claims." *Id.*

26 **B. Plaintiff's Request for Dismissal is a Tactical Ploy and Plaintiff Should Not**  
27 **be Permitted to Dismiss the Case Without Prejudice**

28 Plaintiff's dismissal is a tactical ploy and, as such, the dismissal should be granted with  
prejudice, not without. Plaintiff intends to dismiss his action in this Court but he does not seek a

1 dismissal in a final resolution of his claims. Instead, Plaintiff intends to attempt to obtain  
2 recovery in another forum at the expense of PG&E. As will be explained below, the practice of  
3 forum shopping is improper and is disapproved of by both state and federal courts<sup>1</sup>. If Plaintiff is  
4 allowed to dismiss this case without prejudice and shop for a forum that he finds more suitable it  
5 could lead to extreme prejudice to PG&E and an incredible undue burden on the judicial system.

6 Plaintiff's intent to forum shop is established by the facts. All of the pro per plaintiffs,  
7 including Plaintiff, filed requests for dismissals. All but two of these requests stated that the  
8 grounds for dismissal was "due to complete diversity jurisdiction. Diversity jurisdiction is one of  
9 the two forms of jurisdiction that federal courts are required to have before they can hear a claim.  
10 Diversity jurisdiction allows federal courts to hear controversies "between Citizens of different  
11 States." U.S. Constitution, Art. III, § 2. "The district Courts shall have original jurisdiction of  
12 all civil actions where the matter in controversy exceeds the sum or value of \$75,000, and is  
13 between ...citizens of different States." 28 U.S.C. § 1332(a). It is clear that the pro per plaintiffs  
14 believe that diversity jurisdiction exists. It is also clear that there is no other reason to state that  
15 diversity jurisdiction exists unless the plaintiffs are attempting to establish federal diversity  
16 jurisdiction (i.e., plaintiffs are shopping for another forum for their claims).

17 Around the time the pro per plaintiffs began filing their requests for dismissal, change of  
18 address notices were filed in all but one of the pro per cases. Many of these notices indicated that  
19 the named plaintiffs now maintain new addresses in states other than California, including  
20 Nevada, Arizona, Colorado, Texas, South Carolina, and Washington. The remainder of notices  
21 received by PG&E (eight change of address notices identified on the docket were not received by  
22 PG&E) listed addresses in different counties of California. The majority of these notices were  
23 filed after the requests for dismissals were already filed. These change of address forms further  
24 confirm that the pro per plaintiffs intend to engage in forum shopping. Based on the statement in  
25 the requests for dismissal that complete diversity exists it is obvious that the concurrent mass  
26 filing of change of address notices is intended to support the manufacture of diversity

27 <sup>1</sup> California law holds that Courts should not allow forum shopping. See *Henderson v. Superior Court*, 77  
28 Cal. App. 3d 583, 593-594 (Cal. App. 2d Dist. 1978); *Appalachian Ins. Company v. Superior Court* (1984) 162  
Cal.App.3d 427, 438; *Delfosse v. C.A.C.I., Inc.-Federal* (1990) 218 Cal.App.3d 683, 691. Also, in *Hanna v.*

1 jurisdiction. There can be no other reason plaintiffs have noticed changes of address after the  
2 requests for dismissals were filed other than an attempt to establish diversity jurisdiction.

3 Plaintiff's ploy could not be more transparent. Aside from the fact that it is highly  
4 unlikely that all of the plaintiffs changed domicile at the same time, the facts support a theory  
5 that Plaintiff has no intention of resolving his claims through dismissal. Instead, the pro per  
6 plaintiffs, including Plaintiff, intend to seek recovery in different forums. In addition, given the  
7 above facts, it is clear that if all of the pro per plaintiffs are allowed to dismiss their cases without  
8 prejudice then they will likely file a multiplicity of actions against PG&E in other California state  
9 Courts and in federal Courts around the Country. PG&E will be faced with litigation in multiple  
10 jurisdictions and the cost of defending all of these cases will be extremely high. Moreover, the  
11 burden on the Court will be extensive and significant.

12 There is also a high possibility that the pro per plaintiffs' attempts to bring actions in  
13 federal court pursuant to diversity jurisdiction will fail. Federal law clearly holds that it is  
14 improper to attempt to manufacture diversity jurisdiction. "There must be an actual, not  
15 pretended, change of domicile; in other words, the removal must be a real one, *animo manendi*,  
16 and not merely ostensible." *Morris v. Gilmer*, 129 U.S. 315, 328 (internal citation omitted). The  
17 burden will fall to the plaintiffs that have noticed out of state addresses to prove that the new  
18 addresses are their place of domicile in order to establish that they are a citizen of that state. The  
19 party seeking to invoke federal jurisdiction bears the burden of demonstrating that the  
20 requirements of diversity are met. See *Pollution Control Indus. Of America, Inc. v. Van Gundy*,  
21 21 F.3d 152, 155. "A person's state citizenship is determined by their state of domicile, not their  
22 state of residence. A person is domiciled in a location where he or she has established a fixed  
23 habitation or abode in a particular place, and [intends] to remain there permanently or  
24 indefinitely." *Lew v. Moss*, (9<sup>th</sup> Cir. 1986) 797 F.2d 747, 749-750 (internal quotations omitted).  
25 It has further been held that "domicile is generally a compound of physical presence plus an  
26 intention to make a certain definite place one's permanent abode." *Weible v. United State*, (9<sup>th</sup>  
27 Cir. 1957) 244 F.2d 158, 163.

28  

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Plummer, 380 U.S. 460, the United States Supreme Court held that one of the aims of the *Erie* rule was to discourage  
forum-shopping. See *Hanna* at 468.

1 Based on the hasty manner in which the pro per plaintiffs served their notices of change  
2 of address, following the claims of diversity jurisdiction made in the requests for dismissal, it is  
3 unlikely that the pro per plaintiffs who have indicated a new state of residence will be able to  
4 establish that they are, in fact, citizens of those states. This will inevitably lead to more cases  
5 filed in California courts against PG&E once the federal actions are rejected, further burdening  
6 the Court system and prejudicing PG&E.

7 In the *Wells* case, the Court identified just such prejudice to the defendant and burden on  
8 the Court system as a reason for disallowing the plaintiff to dismiss without prejudice. In that  
9 case, the plaintiff's dismissal came after the plaintiff failed to amend its complaint in the time  
10 allowed following the defendant's successful demurrer but that should not change the outcome  
11 here. In the cases *Cravens* and *Melzark, supra*, the Court refused to grant a dismissal without  
12 prejudice when no final ruling had been made on pending dispositive motions, similar to the  
13 situation here. If the plaintiffs are allowed to engage in this tactical ploy and forum shop until  
14 they find individual forums with which they are each satisfied, PG&E will be faced with  
15 significant prejudice and an incredible burden that will be placed on both the state and federal  
16 court systems. The plaintiffs, on the other hand, will not lose any rights because they have  
17 already had multiple attempts to amend their complaint and they have repeatedly failed to state  
18 facts sufficient to state any actionable causes of action, as discussed in PG&E's Demurrer. As  
19 such, in order to prevent undue prejudice and a burden on the Court system, PG&E requests that  
20 the Court grant a dismissal, but with prejudice.

### 21 **III. IN THE ALTERNATIVE, PG&E'S DEMURRER AND MOTION TO STRIKE** 22 **SHOULD BE GRANTED**

23 As discussed above, in order to deter the use of dismissals as a tactical ploy and to avoid  
24 prejudice to PG&E and a burden on the Court system, the Court should grant a dismissal with  
25 prejudice. In the alternative, PG&E requests that the Court hear its Demurrer and MTS before  
26 making a ruling on the Request. PG&E's Demurrer establishes that Plaintiff has, once again,  
27 failed to state a cause of action. The Demurrer also requests a dismissal with prejudice. There  
28 are grounds stated in the demurrer for such an outcome. In addition, PG&E's Demurrer and  
MTS strike are unopposed and, therefore, they should be granted on the grounds stated therein.



1 As such, PG&E requests that the Court permit it the opportunity to have its Demurrer and MTS  
2 heard because there is a possibility that a ruling granting these motions could prevent significant  
3 future prejudice.

#### 4 IV. CONCLUSION

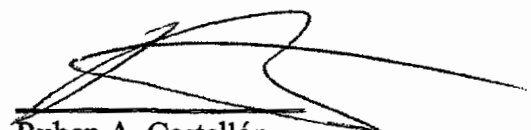
5 California law holds that a plaintiff does not maintain a right to dismiss an action when a  
6 request for dismissal is a tactical ploy. Plaintiff's Request is made as a tactical ploy. Plaintiff  
7 wishes to dismiss this action and seek another forum in which to bring claims against PG&E.  
8 Working in conjunction with the other pro per plaintiffs, Plaintiff intends to bring multiple  
9 actions against PG&E in federal courts in several states outside of California. Plaintiff's Request  
10 will not serve to complete this action but will only place further undue prejudice, burden and  
11 expense on PG&E and additional strain on the judicial system. California law prohibits such an  
12 outcome.

13 Based on the foregoing, PG&E requests that the Court grant dismissal with prejudice or,  
14 in the alternative, proceed with the hearing on PG&E's Demurrer and MTS. Moreover, because  
15 the Demurrer and Motion to strike are unopposed, PG&E request that the Court grant both  
16 motions in their entirety and dismiss Plaintiff's SAC without leave to amend.

17 Dated: June 24, 2015

CASTELLÓN & FUNDERBURK LLP

18  
19 By:

  
20 Ruben A. Castellón  
21 Alastair F. Hamblin  
22 Attorneys for Pacific Gas and Electric  
23 Company  
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PROOF OF SERVICE  
[C.C.P. § 1013, C.R.C. § 2008, F.R.C.P. Rule 5]

I, Skarleht Samayoa, state:

I am a citizen of the United States. My business address is 811 Wilshire Boulevard, Suite 1025 Los Angeles, CA 90017 I am employed in the City and County of Los Angeles where this mailing occurs. I am over the age of eighteen years and not a party to this action. On the date set forth below, I caused to be served the foregoing document described as:

**PACIFIC GAS AND ELECTRIC COMPANY'S MEMORANDUM OF POINTS AND  
AUTHORITIES REGARDING THE PLAINTIFF'S RIGHT TO DISMISS AN ACTION  
WHEN DISPOSITIVE MOTIONS ARE PENDING**

on the following person(s) in this action by FIRST CLASS MAIL addressed as follows:

Nick Panchev  
25633 Anderson Ave.  
Barstow, CA 92311  
Tel: 760-678-4708

: BY FIRST CLASS MAIL - I am readily familiar with my firm's practice for collection and processing of correspondence for mailing with the United States Postal Service, to-wit, that correspondence will be deposited with the United States Postal Service this same day in the ordinary course of business. I sealed said envelope and placed it for collection and mailing this date, following ordinary business practices.

: BY FACSIMILE - I caused said document to be transmitted by Facsimile machine to the number indicated after the address(es) noted above. (As courtesy copy only.)

: BY OVERNIGHT DELIVERY - I caused said document to be transmitted by Federal Express overnight delivery on the next business day to counsel at the address(es) noted above. (To Counsel for Defendants, deposited on [add date here] at 811 Wilshire Blvd., Suite 1025, Los Angeles, CA 90017-2606. Los Angeles, California)

X: BY PERSONAL SERVICE - ACE Attorney Service was directed to serve each envelope(s) by hand to the offices of the addressee(s).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed this date at Los Angeles, California.

June 24, 2015



\_\_\_\_\_  
Skarleht Samayoa



EXHIBIT “4”



VICTIMS TOWN OF HINKLEY  
Temporary Mailing Address  
Attn: [REDACTED] for ET AL  
[REDACTED]  
Pahrump, NV 89048

June 18, 2015

The Honorable Leondra R. Kruger  
Supreme Court of California  
350 McAllister Street  
San Francisco, CA 94102-4797

The Honorable Leondra R. Kruger:

The Victims are not seeking an opine, nor subject matter review from an appeal.

Just to let you know of what is transpiring in the Superior Court County of San Bernardino, State of California.

In Summary, the Victims, per attached hereto Volume, has voluntarily dismissed their cases, without prejudice, prior to trial, prior to hearings, prior to hearings on motions that should not be construed as being dispositive in the absence of conclusive hearing and in the absence of opportunity to file opposition by the adversary party, thus prejudicial to the Plaintiffs.

Per attached hereto cover page within said Volume, the Minutes are seeking from the Plaintiffs to execute Memorandum of Points and Authorities, thereafter entered dismissal, and it appears that the Court is asking them to appear on filed motion for demurer and striking of the Plaintiff's SAC, which was timely filed thereafter granted leave of court to amend, which was filed by the Defendant just two days before the dismissal and the Plaintiffs have not even received such Motion, nor aware of that paper content.

Said Minutes are citing just one "GENERALLY RYLAARSDAM, ET AL, CAL. PRAC. GUIDE: CIV. PRO. BEFORE TRIAL (TRG) 2014) 11:25-11:25.20, PP. 11-23-11-16 ((not construed as a majority to override).

Those Plaintiffs should not be subjected to entertain such an order, on the following grounds:

**Absolute right to dismiss:** Unless one of the exceptions below applies, plaintiff's right to dismiss anytime before trial is absolute. The clerk of the court has no discretion to refuse to enter the dismissal; and the court has no power to set it aside against plaintiff's will. [O'Dell v. Freightliner Corp. (1992) 10 CA4th 645, 659, 12 CR2d 774, 781] CCP § 581(b) treats equally dismissals with or without prejudice with respect to the right to dismiss before commencement of trial. [Kyle v. Carmon (1999) 71 CA4th 901, 909, 84 CR2d 303, 308]

**Procedure:** A voluntary dismissal, with or without prejudice, may be accomplished before trial simply by plaintiff's written request to the court clerk; or by oral or written request to the court. [CCP § 581(b)(1); see *Sanabria v. Embrey* (2001) 92 CA4th 422, 425-426, 111 CR2d 837, 838] FORM: Request for Dismissal (Judicial Council form 982(a)(5)). See Cal. Prac. Guide Civ. Pro. Before Trial FORMS (TRG). (1) [11:27a]

**Effective upon tender:** The clerk of the court has no power to refuse a request for dismissal. The dismissal is effective upon tender, and all subsequent proceedings are void (other than issues relating to court costs and fees). [*Aetna Cas. & Sur. Co. v. Humboldt Loaders, Inc.* (1988) 202 CA3d 921, 931, 249 CR 175, 181-182--immaterial that case had been consolidated for trial with another action]

**Not affected by 'fast track':** Plaintiff's right to dismiss is not subject to fast track statutes and rules. Thus, although plaintiff may refile following a dismissal without prejudice (which may have the same effect as a stay or continuance), the court cannot set the dismissal aside and order a dismissal with prejudice. [*Harris v. Billings* (1993) 16 CA4th 1396, 1403, 20 CR2d 718, 722]

**Commencement of trial:** The right to dismiss with or without prejudice exists 'at any time before the actual commencement of trial, upon payment of costs, if any.' [CCP § 581(b)(1)] Once 'trial' has commenced, a voluntary dismissal is generally allowed only with prejudice; see discussion at ¶ 11:28 ff. (But there are qualifications as to what constitutes 'commencement of trial'; see ¶ 11:18 ff.)

**Statutory definition:** Trial is deemed to 'actually commence at the beginning of the opening statement or argument of any party or his or her counsel, or if there is no opening statement, then at the time of the administering of the oath or affirmation to the first witness, or the introduction of any evidence.' [CCP § 581(a)(6)] (b) [11:17.2]

**Interpreted to include proceedings not normally considered trials:** Despite its precision, the statute is interpreted to encompass dispositive rulings before trial (see ¶ 11:18 ff.). 'Commencement of trial' is held to be 'illustrative rather than exclusive of the circumstances under which a trial has begun.' [*Gray v. Sup.Ct. (Hunter)* (1997) 52 CA4th 165, 171, 60 CR2d 428, 431 (emphasis added; internal quotes omitted)] 'Trial' includes 'the examination ... of the facts or law put in issue in a cause.' [*Gray v. Sup.Ct. (Hunter)*, supra, 52 CA4th at 171, 60 CR2d at 431 (emphasis added)] [11:17.3-17.4] Reserved.

**Dispositive rulings before trial:** Although the statute says the right to dismiss continues until 'actual commencement of trial,' that right is superseded by a ruling or determination that effectively disposes of plaintiff's case, thereby obviating the need for trial. [*Gray v. Sup.Ct. (Hunter)* (1997) 52 CA4th 165, 173, 60 CR2d 428, 433; *Malovec v. Hamrell* (1999) 70 CA4th 434, 441, 82 CR2d 712, 717, fn. 4--right to voluntarily dismiss without prejudice (or even with prejudice) terminated at time of court's ruling disposing of case]

**NO TACTICAL PLOY** Compare--dismissal after dispositive motion filed as tactical ploy: Several cases hold plaintiff's right to dismiss the action without prejudice may be cut off where a dispositive motion is pending, before any ruling thereon, if the dismissal appears to be a tactical ploy. [*Hartbrodt v. Burke* (1996) 42 CA4th 168, 175, 49 CR2d 562, 567--request for dismissal without prejudice filed day before hearing on motion for terminating sanction in discovery dispute; *Cravens v. State Board of Equalization* (1997) 52 CA4th 253, 257, 60 CR2d 436, 438--same, after expiration of time to file opposition to motion for summary judgment; see also *Mary Morgan, Inc. v. Melzark* (1996) 49 CA4th 765, 770, 57 CR2d 4, 7--voluntary dismissal not permitted after summary judgment hearing commenced and was continued to permit discovery] [11:25.11-25.14] Reserved.

**Voluntary Dismissal Is Not Appealable.** A voluntary dismissal under CCP §581 is not appealable. The entry of request for a dismissal is a ministerial, not judicial, act and no appeal lies from it. A willful dismissal without prejudice terminates that action for all time and afford the appellate court no jurisdiction to review motion made prior to dismissal. [*Gutkin v. University of Southern California*, 101 CA4th 967, 975, 125, CR2d 115, 121 (2002) .]

**Preclusive Effect.** Voluntary Dismissal Without Prejudice. By definition, a voluntary dismissal without prejudice is not a final judgment on the merits and therefore has no preclusive effect. [*Syufy Enterprises v. City of Oakland*, 104 CA4th 869, 897, 128 CR2d 808, 816, (2002).]

When plaintiff files a valid request for dismissal without prejudice, it has the right to refile the action. [*Zapata v. Universal Care, Inc.*, 107 CA4th 1167, 1174, 132 CR2d 842, 846-47 (2003).]

**No Demurrer taken under submission has occurred.** If demurrer is taken under submission, the California should require the clerk to notify the parties of the ruling, but such notification does not constitute service of notice of the court's decision or order described in CCP § 472b. See Cal Rules of Ct 3.1109(a)-(c).

**Timing:** The right to dismiss without prejudice expires upon 'the actual commencement of trial' (CCP § 581(b)). 'Trial' is interpreted broadly to include demurrers and motions that dispose of the litigation (see ¶ 11:18 ff.).

**No SLAPP dismissal:** If plaintiff voluntarily dismisses before the hearing on defendant's anti-SLAPP motion (see ¶ 7:207), the court cannot rule on the motion. Nevertheless, defendant is presumed to be the 'prevailing party' for purposes of attorney fees under the antiSLAPP statute (see ¶ 11:39.22a). 1.

**Plaintiff's Right to Dismiss Before Trial:** Subject to exceptions noted below, plaintiff has the absolute right to dismiss the action 'any time before the actual commencement of trial.' [CCP § 581(b)(1)]

**Where dispositive pretrial ruling pending?** It is unclear whether the mere pendency of a dispositive demurrer or motion cuts off plaintiff's 'absolute' right to dismiss without prejudice. The Supreme Court has stated in dictum: '(W)e note that such right of voluntary dismissal ... would also not be impaired prior to a decision sustaining the demurrer.' [Wells v. Marina City Properties, Inc. (1986) 29 C3d 781, 789, 176 CR 104, 109 (emphasis in original); see also Christensen v. Dewor Developments (1983) 33 C3d 778, 785, 191 CR 8, 12-13--plaintiff could dismiss without prejudice while demurrer to first amended complaint pending (§ 11:19.2)] The meaning and effect of this dictum is unclear: (a) [11:25.1] View that right to dismiss continues until ruling: Several cases interpret Wells to mean that the cut-off date on the right to dismiss without prejudice 'should run from some sort of ruling, at least when the motion to dismiss might be denied.' [M & R Properties v. Thomson (1992) 11 CA4th 899, 905, 14 CR2d 579, 582-583 (emphasis added); Kyle v. Carmon (1999) 71 CA4th 901, 912, 84 CR2d 303, 310--plaintiff may voluntarily dismiss after defendant files antiSLAPP motion and hearing is held, but before court rules on motion; Zapanta v. Universal Care, Inc. (2003) 107 CA4th 1167, 1173-1174, 132 CR2d 842, 846-847--voluntary dismissal filed before deadline for opposition to summary judgment motion was effective because 'case had not yet reached a stage where a final disposition was a mere formality']

**Tentative ruling as bar?** One case holds that as long as no actual ruling or order has been made, plaintiff can dismiss without prejudice even after learning of an adverse tentative ruling. [See Datner v. Mann Theatres Corp. of Calif. (1983) 145 CA3d 768, 771, 193 CR 676, 678]

**Terminates jurisdiction as to claims or parties dismissed:** As long as plaintiff has the right to dismiss voluntarily, the dismissal request must be given immediate effect. Except as noted below, a voluntary dismissal of an entire action deprives the court of both subject matter and personal jurisdiction. [Harris v. Billings (1993) 16 CA4th 1396, 1405, 20 CR2d 718, 723; Sanabria v. Embrey (2001) 92 CA4th 422, 425, 111 CR2d 837, 839-- dismissal effective immediately as to party dismissed although action continued as to other parties]

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**EXHIBIT “A”**



**POISONED AQUIFERS WITH ARSENIC AND URANIUM, ENTIRE TOWN OF HINKLEY, CA 92347**

POISONED WITH / CONCENTRATION	LATITUDE COORDINATES	LONGITUDE COORDINATES	AQUIFER #
URANIUM AT 70 pCi/L	34° 55' 58.20" N	117° 11' 55.46" W	1
ARSENIC AT 2,500 ppb	34° 54' 27.22" N	117° 10' 34.43" W	2
ARSENIC 130 ppb	34° 54' 41.49" N	117° 11' 16.92" W	3
ARSENIC AT 740 ppb Alleged area coordinates (applicable) therefrom adjacent area coordinates	34° 55' 45.35" N 34° 56' 09.70" N	117° 07' 21.99" W 117° 08' 08.19" W	6 88
ARSENIC AT 19 ppb	34° 55' 00.10" N	117° 13' 04.58" W	7
ARSENIC AT 270 ppb	34° 55' 59.31" N	117° 11' 57.13" W	8
URANIUM AT 35 pCi/L	34° 54' 40.11" N	117° 07' 07.49" W	10
ARSENIC AT 57 ppb	35° 00' 56.45" N	117° 12' 13.30" W	11
ARSENIC AT 34 ppb	35° 01' 43.44" N	117° 11' 51.61" W	12
ARSENIC AT 9.9 ppb	43° 56' 12.41" N	117° 14' 00.13" W	13
ARSENIC AT 350 ppb	35° 01' 55.43" N	117° 12' 19.21" W	14
ARSENIC AT 140 ppb	35° 01' 46.10" N	117° 12' 27.24" W	16
ARSENIC AT 73 ppb	34° 55' 24.01" N	117° 13' 15.34" W	19
ARSENIC AT 19 ppb	34° 56' 17.58" N	117° 09' 05.62" W	21
URANIUM AT 49 ug/L	34° 55' 12.82" N	117° 12' 39.47" W	22
URANIUM AT 70 pCi/L Alleged area coordinates (applicable) therefrom adjacent area coordinates	34° 55' 46.32" N 34° 55' 58.20" N	117° 11' 50.31" W 117° 11' 55.46" W	1 23
URANIUM AT 49 ug/L	34° 55' 12.82" N	117° 12' 39.47" W	24
URANIUM AT 49 ug/L	34° 55' 12.82" N	117° 12' 39.47" W	25

**POISONED AQUIFERS WITH ARSENIC AND URANIUM, ENTIRE TOWN OF HINKLEY, CA 92347**

POISONED WITH / CONCENTRATION	LATITUDE COORDINATES	LONGITUDE COORDINATES	AQUIFER #
ARSENIC AT 19 ppb	34° 59' 44.96" W	117° 12' 26.32" W	26
ARSENIC AT 470 ppb	34° 55' 40.25" N	117° 12' 12.61" W	27
ARSENIC AT 46 ppb	34° 55' 10.12" N	117° 13' 05.60" W	28
ARSENIC AT 150 ppb	34° 55' 04.54" N	117° 13' 04.59" W	29
ARSENIC AT 79 ppb	35° 02' 39.28" N	117° 12' 09.67" W	30
ARSENIC AT 19 ppb	34° 55' 06.02" N	117° 08' 37.94" W	33
ARSENIC AT 210 ppb	34° 56' 30.76" N	117° 10' 57.21" W	37
URANIUM AT 49 ug/L	34° 55' 12.82" N	117° 12' 39.47" W	38
ARSENIC AT 76 ppb	34° 54' 34.68" N	117° 11' 07.73" W	39
ARSENIC AT 11	34° 54' 41.74" N	117° 11' 12.13" W	51
ARSENIC AT 120 ppb	34° 56' 13.98" N	117° 11' 13.27 W	53
ARSENIC AT 140 ppb	34° 56' 20.65" N	117° 11' 09.40" W	57
ARSENIC AT 54 ppb	34° 56' 31.21" N	117° 11' 17.40" W	58
ARSENIC AT 24 ppb	34° 55' 32.75" N	117° 07' 07.86" W	61
ARSENIC AT 13 ppb	34° 51' 09.81" N	117° 11' 42.47" W	62
ARSENIC AT 30 ppb	34° 56' 10.70" N	117° 12' 00.25" W	78
ARSENIC AT 740 ppb	34° 56' 09.70" N 34° 55' 46.44" N	117° 08' 08.17" W 117° 07' 39.28" W	88
ppb – parts per billion for Arsenic	pCi/L - picocurie per liter and	ug/L – microgram per liter	for Uranium

**TABLE Test results by three analytical, state certified, laboratories of drinking water in aquifers beneath the real properties identified by APN, within the holding time**

No.	Victim's Name	Hinkley 92347 Address	APN	Aquifer Poisoned With	Concentration	Sample No.
1	Annette Airo	21256 Ash St.	0494-272-01	Uranium	70 pCi/L (western area)	1
2	Tonja and Craig Dishmon	22274 Community Blvd	0494-031-38	Arsenic	2,500 ppb (western area)	2
3	Lloyd and Barbara Vinson	36327 Hinkley Rd	0494-031-04	Arsenic	130 ppb (western area)	3
6	Nick Panchev (neighbor results)	37350 Lenwood Rd	0497-201-09	Arsenic	740 ppb (eastern area)	6
7	Moises Toledo / Juliana Martinez	36633 Hidden River Rd.	0494-163-08	Arsenic	19 ppb (western area)	7
8	Victor Suarez and Saray Ordaz	37531 Mulberry Rd	0494-272-02	Arsenic	270 ppb (western area)	8
10	William and Carolyn Bolin	36310 Lenwood Rd	0497-031-13	Uranium	35 pCi/L (eastern area)	10
11	Keith Hawes	42100 Friends St	0489-193-05	Arsenic	57 ppb (northern area)	11
12	Columbia Garza	21430 Tobacco Rd	0489-271-48	Uranium	34 ug/L (northern area)	12
13	Noel and Jane Corby	19660 Alcudia Rd	0495-161-09	Arsenic	9.8 ppb (western area)	13
14	Shirley Holcroft	21480 Brown Ranch Rd	0489-261-04	Arsenic	350 ppb (northern area)	14
16	Ronald Brown	42750 Orchard Rd	0489-182-08	Arsenic	140 ppb (northern area)	16
19	Robert Richards	20262 W. Hwy 58	0494-061-38	Arsenic	73 ppb (western area)	19
21	Herbert Nethery	23394 Alcudia Rd	0495-031-16	Arsenic	19 ppb (eastern area)	21
22	Alta Findley	36816 Hillview Rd.	0494-142-14	Uranium	49 ug/L (western area)	22
23	Clell Courtney (neighbor results)	Flower Rd.	0494-331-02	Uranium	70 pCi/L (western area)	23
24	Janet Shultz	36827 Hillview Rd	0494-143-22	Uranium	49 ug/L (western area)	24
25	Andrea Perry Williams	36796 Hillview Rd	0494-142-16	Uranium	49 ug/L (western area)	25
26	Norman/ Gary/ Olive Halstead	20455 Halstead Rd.	0489-193-31	Arsenic	19 ppb (northern area)	26
27	Robert Miller / Donna	37241 Sycamore St.	0494-092-06	Arsenic	470 ppb (western area)	27
28	Charles Matthiesen	36771 Hidden River Rd	0494-153-10	Arsenic	46 ppb (western area)	28
29	David Matthiesen	36709 Hidden River Rd	0494-163-10	Arsenic	150 ppb (western area)	29
30	Agustin Carrera	43595 Orchard Rd	0489-251-01	Arsenic	79 ppb (northern area)	30
33	Aurang Khan (neighbor results)	36693 Anson Ave	0494-241-27	Arsenic	24 ppb (eastern area)	33
37	John Ramirez	38006 Pueblo Rd	0495-073-10	Arsenic	210 ppb (central area)	37
38	Richard Heiser	36805 Hillview Rd	0494-143-21	Uranium	49 ug/L (western area)	38
39	Charles Jenkins /Darlene	21884 Catskill Rd	0494-031-77	Arsenic	76 ppb (western area)	39
51	Adolfo and Marina Riebeling	21818 Pioneer Rd	0494-031-49	Arsenic	11 ppb (western area)	51
53	Ken Nitao	37781 Hinkley Rd	0495-061-13	Arsenic	120 ppb (western area)	53
57	Jose Ornelas, Rosalba H	21825 Pera Rd	0495-062-04	Arsenic	140 ppb (western area)	57
58	Matsue Matthiesen	Hinkley Rd	0495-071-03	Arsenic	54 ppb (western area)	58
61	Gilberto/ Esperanza Velazquez	37136 Lenwood Rd	0497-211-41	Arsenic	24 ppb (eastern area)	61
62	Joel Christison	33245 Hinkley Rd	0420-071-13	Arsenic	13 ppb (southern area)	62
78	Oscar Urbina	2118 Santa Fe Ave.	0494-291-02	Arsenic	30 ppb (western area)	78
88	Kim and Min	37679 Dixie Rd	0497-201-01	Arsenic	740 ppb (eastern area)	88

**Poisoned Aquifers and poisoned within Drinking and Whole House Ground Waters with Hexavalent Chromium, based upon disclosure presented by Pacific Gas and Electric Company's Plume Map, located adjacent, or within, and beneath the real properties of Pacific Gas and Electric Company. (Codified into Law Maximum Contaminant Level (MCL) of 10 parts per billion (ppb), effective July 01, 2014, is applicable, as of date, to all owned real properties (over 300) by Pacific Gas and Electric Company, Hinkley, CA 92347**

<b>No.</b>	<b>Monitoring/Extraction Water Well</b>	<b>Result in ppb</b>	<b>No.</b>	<b>Monitoring/Extraction Water Well</b>	<b>Result in ppb</b>
1	SA-MW-05D	4600	51	MW-13	30
2	SA-MW-10D	2800	52	MW-145	29
3	SA-SM-02S	1900	53	MW-38B	28
4	MW-15	1420	54	CA-MW-411S	27
5	SA-MW-20D	1400	55	MW-179D	26
6	MW-11B	1400	56	MW-182S	25
7	SC-MW-26D	1100	57	MW-39D	23
8	MW-20	940	58	MW-28B	23
9	SA-SM-01S	780	59	X-16	23
10	SA-MW-11S	530	60	MW-10	27
11	SA-MW-09S	510	61	MW-109	22
12	SA-MW-06S	510	62	CA-MW-508D	20
13	PT2-MW-10	480	63	SA-SM-10D	18
14	SA-MW-07D	470	64	EX-29	19
15	SA-SM-08D	420	65	EX-15	18
16	SC-MW-215	380	66	MW-28A	17
17	SA-MW-26S	380	67	MW-154-S1	17
18	SA-MW-21S	380	68	SA-SM-10D	18
19	PMW-03	340	69	CA-MW-506D	15
20	SC-MW-03D	330	70	EX-20	14
21	SA-MW-16D	330	71	CA-MW-510D	12
22	SA-MW-12S	330	72	MW-43	13
23	MW-118RD	290	73	MW-27A	12
24	MW-180RD	290	74	MW-50S	12
25	MW-193-S3	275	75	MW-41S	11
26	SA-MW-17S	270			
27	MW-178S	250			
28	SA-MW-04S	230			
29	MW-178D	170			

**Poisoned Aquifers and poisoned within Drinking and Whole House Ground Waters with Hexavalent Chromium, based upon disclosure presented by Pacific Gas and Electric Company's Plume Map, located adjacent, or within, and beneath the real properties of Pacific Gas and Electric Company. (Codified into Law Maximum Contaminant Level (MCL) of 10 parts per billion (ppb), effective July 01, 2014, is applicable, as of date, to all owned real properties (over 300) by Pacific Gas and Electric Company, Hinkley, CA 92347**

30	MW-36	130			
31	SC-MW-13S	120			
32	MW-17	120			
33	CA-MW-302D	110			
34	SA-MW-18D	100			
35	SA-SM-11D	96			
36	CA-MW-405D	94			
37	CA-MW-107D	89			
38	CA-MW-315D	78			
39	CA-MW-402S	77			
40	CA-MW-108S	70			
41	SC-MW-38D	65			
42	MW-42B2	47			
43	CA-MW-412D	45			
44	MW-193-S2	42			
45	MW-04	41			
46	MW-108S	36			
47	MW-03	35			
48	MW-42-B1	34			
49	MW-182D	33			
50	CA-MW-312D	32			





**EXHIBIT “B”**



## **FACTS**

### **FACTS ABOUT AQUIFER**

6. *An aquifer is an underground layer of water-bearing permeable rock or unconsolidated materials (gravel, sand, or silt) from which groundwater can be extracted using water well. The study of water flow in aquifers and the characterization of aquifers is called hydrogeology.*

### **FACTS ABOUT ABANDONEMENT OF AQUIFERS**

*If treatment or remediation of polluted groundwater is deemed to be difficult or expensive, then abandoning the use of aquifer's groundwater and finding an alternative source of water is the only other option.*

### **FACTS ABOUT LEGISLATION**

7. *In November 2006, the Environmental Protection Agency published the Ground Water Rule in the United States Federal Register. The EPA was worried that the ground water system would be vulnerable to contamination from fecal matter. The point of the rule was to keep microbial pathogens out of public water sources. The 2006 Ground Water Rule was an amendment of the 1996 Safe Drinking Water Act. The ways to deal with groundwater pollution that has already occurred can be grouped into the following categories: Containing the pollutants to prevent them from migrating further; removing the pollutants from the aquifer; remediating the aquifer by either immobilizing or detoxifying the contaminants while they are still in the aquifer (in-situ); treating the groundwater at its point of use; or abandoning the use of this aquifer's groundwater and finding an alternative source of water.*

### **FACTS ACCORDING TO UNITED STATES GEOLOGICAL SURVEY (USGS)**

*At link: [http://water.usgs.gov/nawqa/trace/pubs/gw\\_v38n4/](http://water.usgs.gov/nawqa/trace/pubs/gw_v38n4/)*

8. *"Concentrations of naturally occurring arsenic in ground water vary regionally due to a combination of climate and geology. Although slightly less than half of 30,000 arsenic analyses of ground water in the United States were  $\leq 1$   $\mu\text{g/L}$ , about 10% exceeded 10  $\mu\text{g/L}$ . At a broad regional scale, moderate to high arsenic concentrations appear to increase from east to west across the United States, although high concentrations exist in all physiographic provinces. Arsenic concentrations in ground water of the Appalachian Highlands and the Atlantic Plain generally are very low. Concentrations are somewhat greater in the Interior Plains and the Rocky Mountain System. Ground water in the Intermontane Plateaus and Pacific Mountain System of the western United States more commonly contains arsenic concentrations  $> 10$   $\mu\text{g/L}$  compared with that in the eastern physiographic provinces. Investigations during the last decade in New England, Michigan, Minnesota, South Dakota, Oklahoma, and Wisconsin suggest that moderate to high arsenic concentrations ( $> 10$   $\mu\text{g/L}$ ) are more widespread and common than previously recognized. "High" concentrations are defined as above the Environmental Protection Agency's established Maximum Contaminant Levels (MCLs) or other non-regulatory health-based levels for constituents or elements not having MCLs."*

9. *At Link: <http://www.mojavewater.org/files/HelendaleFaultStudy03-4069.pdf>*

*Page 41: "Arsenic concentrations in water from nine wells in the regional aquifer ranged from less than the detection limit of 2 to 130  $\mu\text{g/L}$  with a median concentration of 11  $\mu\text{g/L}$ "*

### **ACCORDING TO STAKEHOLDERS, AQUIFERS ARE ALSO "PRIVATE WATER SYSTEMS"**

10. *Typically, private water systems that serves more than 25 people at least 60 days of the year and have more than 15 service connections are regulated by the EPA. Polluted ground water could cause illness.*

### **FACTS ABOUT GROUND WATER AND DOMESTIC WATER WELL**

11. *When rain falls, much of it is absorbed into the ground. Water that's not used by plants moves downward through pores and spaces in the rock until it reaches a dense layer of rock. water trapped below the ground in the pores and spaces above the dense rock barrier is called ground water, and this is the water we get when we drill wells. Another common term for ground water is "aquifer" or "ground water aquifer."*

## FACTS ABOUT ARSENIC IN GROUND WATER

### Fact Sheet For Arsenic

12. *Per the State of California Lahontan Water Board Attachment G, Page 6, ... "the federal and state MCL for arsenic is 10 µg/L. The US Geological Survey conducted sampling for various constituents in wells in the Mojave Water Agency management area from 1991 to 1997, including wells in the Hinkley area. The study found arsenic in wells (up to 200 feet in depth) ranging from less than 1 µg/L to 12 µg/L with most concentrations under 10 µg/L. While the USGS study was conducted after the release of chromium from the Hinkley Compressor Station, sampling occurred before the use of carbon amendment injections to groundwater, and thus reflects levels prior to in-situ remediation". Thus, the In-Situ / Agricultural operations, implemented by PG&E, has subsequently caused (anthropogenic causation factor) the poisoning of ground waters with Arsenic, at substantially more than the average of 3 ppb for naturally occurring arsenic in ground waters, now found at almost all wells. Arsenic is released from a variety of anthropogenic sources (USEPA), including waste incineration. (not limited to industrial facility's cooling towers). These anthropogenic releases of arsenic can elevate environmental arsenic concentrations. Human exposure to arsenic can result in a variety of chronic and acute effects. In particular, there is evidence that associates chronic arsenic ingestion at low concentrations with increased risk of skin cancer, and that arsenic may cause cancers of the lung, liver, bladder, kidney, and colon (ATSDR, 1998). Because of the human health risks associated with arsenic, USEPA regulates the level of arsenic in drinking water at MCL of 10 ppb and Legal Reporting Limit at 2 ppb. [Mandatory]. (Anthropogenic Sources of Arsenic is from man-made sources, such as In-Situ and Agricultural Operations, implemented by PG&E in Hinkley, CA)*

## FACTS ABOUT URANIUM IN GROUND WATER

### Fact Sheet for Uranium

13. *The average concentration of uranium in the groundwater of the United States is about 2 pCi per liter (pCi/L). The average concentration in U.S. soils is about 2 pCi/g (3 ppm); The U.S. Environmental Protection Agency's (EPA) drinking water standard for uranium is 20 pCi/L (EPA 2009). Uranium present in the rocks and soil as a natural constituent represents natural background levels. Average Uranium Concentrations in Drinking Water for California was reported at average of 2.7 pCi/L (picocuries per liter). Gross beta particles are a form of radiation that can pollute drinking water when disturbances, such as In-Situ Remediation for Hexavalent Chromium is in place, which mobilizes radioactive minerals. Gross beta radiation is a known human carcinogen. Because any level of exposure to gross beta radiation can cause cancer, EPA has set a health goal of zero for this radioactive contaminant. Any exposure to this radioactive contaminant poses cancer risk. The maximum level set by EPA is at 15 pCi/L and the required by law disclosure on detection level is at 1 pCi/L. Therefore, anthropogenic (human activities, such as PG&E's In-Situ and Agricultural Treatment operations, are the cause for poisoning ground waters, not natural processes as the cause. Concentration for Uranium, greater than the background level (naturally occurring level) of 2.7 pCi/L must be immediately investigated by the regulatory governmental agencies. Concentration greater than the legal reporting limit of 1 pCi/L, trigger mandatory disclosure as required by law.*

## FACTS ABOUT SAMPLING OF GROUND WATER IN AQUIFER

14. *SAMPLING Two persons Required – "clean hand" and "dirty hand". No purging (rinsing well casing prior to sampling, since it will dilute and/or cause oxidation in event Arsenic and or Uranium are dissolved and/or in decay stage, and total, (not filtered) sample sent to analytical laboratory will indicate the true result. EPA Method of filtering a sample prior to laboratory's test, by injection tool with filter attached at the end, is construed as filtered sample, and water sample will not indicate the true reading of any toxic substance.*

## **FACTS ABOUT MOVEMENT OF GROUND WATER**

### **Fact Sheet For Ground Water Movement**

15. *Per UNITED STATES GEOLOGICAL SURVEY (USGS) "Water is recharged to the groundwater system by percolation of water from precipitation and then flows to the stream through the groundwater system". "Water pumped from the groundwater system causes the water table to lower and alters the direction of groundwater movement. Some water that flowed to the stream no longer does so and some water may be drawn in from the stream into the groundwater system, thereby reducing the amount of streamflow." "Contaminants introduced at the land surface may infiltrate to the water table and flow towards a point of discharge, either the well or the stream." "There are three types of movement of groundwater or the water table that we should be familiar with: percolation of infiltrated water, raising and lowering of the water table, and downslope flow of groundwater."*

*"Permeability is a measure of how fast water will flow through connected openings in soil or rock." "The capacity of soil or rock to hold water is called porosity." "Water seeping into an aquifer is known as recharge." "Groundwater that becomes trapped under impermeable soil or rock may be under pressure. This is called a confined or artesian aquifer." "Groundwater moves very slowly from recharge areas to discharge points. Flow rates in aquifers are typically measured in feet per day. Flow rates are much faster where large rock openings or crevices exist (often in limestone) and in loose soil, such as coarse gravel."*

*"Induced pressure in the aquifer's ground water is due to excessive pumping in connection therewith the In-Situ and Agricultural Treatment Operation, and creates unstable ground water movement in all directions, not just down gradient, and in such an event, the saturated areas in many aquifers beneath the town of Hinkley, CA 92347 is prone to receive poisonous substances at various times and at various concentration over the regulatory maximum legal limits. While, recharge or other hydrostatic pressure could alter the ground water movement, the fact that excessive pumping has occurred and is occurring, is the most certain cause for chaotic ground water movement, causing unprecedented cross contamination with toxic substances that were disturbed due to such excessive pumping, including but not limited to excessive irrigation of many alfalfa fields in Hinkley, CA 92347 resulted therefrom the In-Situ and Agricultural Treatment Operation. Other causes for chaotic movement of ground water saturated with disturbed and dissolved toxic substances are other, deemed as experimental methods, such as bioreactor and other, deemed as failed operations to remove the historic contamination of Hexavalent Chromium for 60-years, out of aquifers beneath Hinkley, CA 92347"*

## **FACTS ABOUT PURPORTED LOCKHART EARTHQUAKE FAULT**

### **Fact Sheet For Purported Lockhart Earthquake Fault**

16. *"Certain Earthquake Faults in California are undetermined and therefore construed as purported to exist, and are unconfined and have no surface expression (no surface trace like other certain faults), including but not limited to the Lockhart Earthquake Fault, purported to be located within the town of Hinkley, CA 92347, and therefore construed as not only highly speculative in regards to location in the town of Hinkley, CA 92347, but highly speculative as to cause impediment in ground water movement within the Hinkley, CA 92347 aquifers."*

According to California State University, Fullerton Department of Geological Sciences, Reports and Maps, link:[http://groundwater.fullerton.edu/Mojave\\_Water\\_Agency/Basin\\_Reports\\_files/Harper%20Lake%20Basin%20Watershed%20Report%20Final.pdf](http://groundwater.fullerton.edu/Mojave_Water_Agency/Basin_Reports_files/Harper%20Lake%20Basin%20Watershed%20Report%20Final.pdf), Page 21 Map, the purported Lockhart Earthquake Fault is not located in the town of Hinkley, CA 92347, and is at least 14-miles away from Hinkley, CA 92347, including but not limited to that there is no impediment to ground water movement in the aquifers within the town of Hinkley, CA 92347 further supported non-existence at Map of Page 158.

*"Substantial testing of aquifers in the town of Hinkley, CA 92347 was recently conducted and during 1968-1978 testing by Department of Interior, in the vicinity of the purported Lockhart Earthquake Fault and the facts remains that due to results of tests on each side of the purported Lockhart Earthquake Fault, yielded detection of toxic substances, including but not limited to recently detected Arsenic and Uranium"*

*"Any other scientific theory attempting to contradict such facts exhibited herein are construed as highly speculative and biased, and therefore inadmissible".*

## FACTS ABOUT AGRICULTURAL TREATMENT OPERATIONS AND IN-SITU OPERATIONS

### Fact Sheet For Agricultural Treatment Operations and In-Situ Operations

17. Based upon the facts described herein below, treatment technology for Chromium (VI), by the purported "Agricultural Treatment Operations and In-Situ Operations", more specifically described therein link:

*"[http://enr.uconn.edu/~baholmen/docs/ENVE290W/National%20Chromium%20Files%20From%20Luke/Cr\(VI\)%20Handbook/L1608\\_C08.pdf](http://enr.uconn.edu/~baholmen/docs/ENVE290W/National%20Chromium%20Files%20From%20Luke/Cr(VI)%20Handbook/L1608_C08.pdf), appear to be highly speculative, since removal of Chromium (VI) from ground drinking water is more difficult to remove, and there is no factual evidence that the Chromium (VI) is converted to Chromium (III) by implementation of purported "Agricultural Treatment Operations nor by the purported In-Situ Operation".*

#### ***"Treatment Technologies for Chromium(VI).***

***Hexavalent Chromium Cr(VI) is far more mobile than Cr(III) and more difficult to remove from water.***

*It is also the toxic form of Cr, presumably owing to the stronger oxidizing potential and membrane transport of Cr(VI) (Katz and Salem, 1992).*

*Typically, natural Cr concentrations are dwarfed by anthropogenic contamination. Dissolved concentrations of total Cr in groundwater from natural processes are typically below 10 mg/l (Richard and Bourg, 1991). A yellow color is imparted to the water at about 1 mg/l Cr(VI) (Palmer and Wittbrodt, 1991)*

***8.1.4 Physical Remediation Processes Chemical and biochemical processes render Cr(VI) unavailable by converting it to the less toxic and less mobile Cr(III) form.***

*Physical processes separate Cr(VI) from the contaminated media (such as groundwater extraction) capture the extracted Cr (using ion exchange resins or granular activated carbon (GAC)), and/or isolate the contamination."*

***8.2.3 Containment Other technologies focus on preventing the spread of contamination into larger areas.***

*These containment technologies include stabilization or solidification, biostabilization, phytostabilization, precipitation, encapsulation, and vitrification of soil. Slurry walls and other physical barriers are used for groundwater containment.*

*Passive in-situ remediation can be achieved by permeable reactive barriers, and hydraulic containment can be attained through pump-and-treat (this process may be enhanced by addition of surfactants).*

*Containment technologies focus on either isolating the contaminants (in the case of in-situ slurry walls) or immobilizing them.*

*Passive remediation may occur as groundwater leaves the containment zone, as in the case of permeable reactive barriers.*

*However, no attempt is made to decrease concentrations of Cr(VI) within the containment zone. In summary, remediation technologies focus on either decreasing toxicity (reducing Cr(VI) to Cr(III)), removing Cr from soil/groundwater or confining the Cr to a certain area.*

***8.5 Containment Technologies Containment technologies are used to either physically stop the spreading of groundwater plumes or to chemically immobilize contaminants in a nonexchangeable, insoluble form.***

*Most containment technologies are performed in-situ, with the exception of soil vitrification prior to landfill disposal.*

*Groundwater containment technologies involve the construction of a physical, chemical, or hydraulic barrier that isolates the impacted zone, either directing impacted water through a treatment zone or stopping its migration.*

## 18. AGRICULTURAL TREATMENT OPERATIONS / IN-SITU REMEDIAL OPERATION'S FACTS

According to Pacific Gas and Electric Company own admission, at PG&E's website link:

<http://www.pgecurrents.com/2011/03/30/pge-continues-work-to-cleanup-hinkley-starts-community-group/>

*Such operations are purported to "convert Chromium (V) to Chromium (III), by pumping ground drinking water contaminated with Chromium and irrigating the roots of alfalfa in alfalfa fields and such alfalfa roots, by microbial process, are purported to convert the Chromium (VI) to Chromium (III)", which assertions are also highly speculative. In September 2010, PG&E presented a feasibility study to the Water Board. Additional documents were submitted in January and March of 2011. The company's recommended alternative uses in-situ treatment in areas with higher concentrations, and agricultural treatment in areas with lower concentrations. PG&E estimates that it will take 40 years for the cleanup to achieve background levels of chromium. The in-situ process starts by injecting food-grade material, such as grain alcohol, into the groundwater to stimulate the growth of naturally occurring bacteria.*

*This bacteria turns hexavalent chromium into trivalent chromium, a naturally occurring substance. Once converted, the trivalent chromium leaves the groundwater and become part of the surrounding soil.*

*The agricultural treatment removes chromium by growing crops, such as alfalfa.*

*Water is pumped through a drip-irrigation system where the root zone of a crop creates conditions that turn hexavalent chromium into trivalent chromium, a naturally occurring substance.*

*Once converted, the trivalent chromium leaves the groundwater and become part of the surrounding soil.*

***(FACT is that such bacteria may convert Chromium III, but not convert Chromium (VI).***

### **FACTS ABOUT AGRICULTURAL TREATMENT OPERATIONS AND IN-SITU OPERATIONS CAUSING FURTHER CONTAMINATION OF AQUIFERS AND GROUND DRINKING WATER WITH OTHER TOXIC SUBSTANCES, INCLUDING ARSENIC AND URANIUM**

#### **Fact Sheet For Agricultural Treatment Operations and In-Situ Operations Causing Further Contamination of Aquifers and Ground Drinking Water With Other Toxic Substances, Including Arsenic and Uranium**

19. Based upon the facts described herein below, the *purported Agricultural Treatment Operations and In-Situ Operations has caused further poisoning of the Aquifers and Ground Drinking Water beneath the town Hinkley, CA 92347 with Arsenic and Uranium, in addition to with the historical, lasting sixty years to date, poisoning with Hexavalent Chromium, also known as Chromium (VI) and Cr6+, to wit:*

Per the State of California "CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD LAHONTAN REGION BOARD ORDER NO. R6V-2014-0023 WASTE DISCHARGE REQUIREMENTS FOR PACIFIC GAS AND ELECTRIC COMPANY GROUNDWATER REMEDIATION PROJECT AGRICULTURAL TREATMENT UNITS WDID NO. 6B361403002" link:

[http://www.waterboards.ca.gov/lahontan/water\\_issues/projects/pge/cao/docs/refs/31\\_r6v\\_2014\\_0023.pdf](http://www.waterboards.ca.gov/lahontan/water_issues/projects/pge/cao/docs/refs/31_r6v_2014_0023.pdf)

***"13. Constituents of Concern. The discharge of extracted groundwater to agricultural treatment units contains waste chromium originating from the compressor station. Extracted groundwater also contains total dissolved solids, nitrate, naturally-occurring uranium and other radionuclides, and naturally-occurring dissolved metals, such as arsenic, manganese, and iron."***

Per the State of California, Lahontan Regional Water Quality Control Board, as of April 2011, the Board was concerned that Pacific Gas and Electric Company's Agricultural and In-Situ Operations, consisting of ground water extraction for such operations, did contain dissolved Arsenic and in decay Uranium and radionuclides.





EXHIBIT "C"



### INTRODUCTION

1. Commencing July 1952, for over a decade and half, Pacific Gas and Electric Company (PG&E), discharged into large open unlined ponds, huge quantity of waste water from the cooling towers, containing the highly toxic and carcinogenic Hexavalent Chromium, with concentration over 5,000 ppb (parts per billion), located on owned property by PG&E, located in Hinkley, California 92347, the N.G. Compressor's Station.

2. To date, June 18, 2015, just about sixty three years later, despite claims by PG&E, that some of the Hexavalent Chromium was abated from the drinking water within the aquifers beneath certain portions of the town of Hinkley, CA 92347, the fact remains that the Hexavalent Chromium is not removed from the drinking water within all aquifers beneath the entire town of Hinkley, CA 9234. As a direct result thereof such poisoning, PG&E acquired hundreds of residences and immediately demolish them, further causing severe diminution in property value, virtually to zero dollar, public nuisance, and the town of Hinkley is now virtually resembling a ghost town, with worthless remaining real properties, and has further caused and is causing to most of the remaining few inhabitants in the town of Hinkley myriad of illnesses and diseases, including but not limited to premature and wrongful death, with majority of the residents, who did left Hinkley to other towns and states in United States, are now in fear of becoming very ill and prematurely dying.

3. Recently discovered by the remaining Victims in the town of Hinkley, CA, (remaining at no other alternative, stranded due to unable to dispose their real properties to no one), during the past nine months, was the fact that the drinking water within the aquifers beneath the entire town of Hinkley, California 92347, (the aquifer is the only source of drinking water since beginning of time for the town of Hinkley, aquifer construed as a public water), was also poisoned with the primary, highly toxic and carcinogenic byproduct's substances Arsenic and Uranium, resulted therefrom PG&E various operations, aimed to remove the Hexavalent Chromium from the drinking water within the aquifers beneath the town of Hinkley, CA 92347. Including but not limited to with other byproducts such as Manganese, now an aquifer so severely poisoned with the most highly toxic and carcinogenic substances, deemed in irreparable status. In fact, the entire town of Hinkley is a Superfund site.

FACTS ABOUT POISONED DRINKING WATER WITHIN AQUIFERS BENEATH THE TOWN OF HINKLEY, CA, PRESENTED BY THE VICTIMS FROM HINKLEY, CA 92347 (THE VICTIMS ARE THOSE PER ATTACHED HERETO "VICTIMS FROM HINKLEY, CA 92347" SIGNATURE'S PAGES)

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4. Regardless of the intensified complaints by the Victims, during the past nine months, virtually in Volumes, nothing has resulted in removing the Arsenic and Uranium from the drinking water within the aquifers, nor there was any action, in appropriate magnitude, by any Governmental agencies, charged with oversight and enforcement, specifically aimed at Pacific Gas and Electric Company (PG&E), to remove their byproducts Arsenic and Uranium therefrom the drinking water within the aquifers beneath the entire town of Hinkley, CA 92347. There are no other known polluters-contaminators-dischargers in the town of Hinkley, CA 92347, other than PG&E.

5. Despite the outcry by the Victims, many are just now diagnosed with terminal cancers and many have their skin within the body virtually falling off, with white spots, some bleeding, some dark as a tar, resulted therefrom utilizing the poisoned water for bathing, due to that there is no other water for such use, no governmental agencies charged with oversight and enforcement, has, or are whatsoever seeking appropriate actions against the only known polluter-contaminator-discharger PG&E. Such no-actions by the Regulatory Agencies is construed by the Victims as inhumane and are incomprehensible.

6. In light of what is transpiring, there is now more than obvious that PG&E was, and now is being vigorously shielded from investigation and prosecution, all to the extreme detriment to the Victims.

7. Furthermore, recent letter from Governmental agency, addressed to one of the Victims, stipulates that the People from Hinkley (the Victims) could be "adversary" to the Government. Since when the Government envisions that the Victims, the citizens of this free country, are an adversary to the Government. This is beyond any human dignity and comprehension.

8. No SLAPP actions, nor any other stipulations restricting the citizens inherent constitutional rights in this free country, particularly aimed at the Victims, will deter the Victims quest to have the truth, particularly the fact that the aquifers, as a public source for drinking water to which more than 25 connections are made, being the case for the entire town of Hinkley, CA 92347, is poisoned by PG&E with byproducts Arsenic and Uranium, particularly with the anthropogenic Arsenic, at concentration of 2,500 ppb. (Legal Limit is 10 ppb).

FACTS ABOUT POISONED DRINKING WATER WITHIN AQUIFERS BENEATH THE TOWN OF HINKLEY, CA, PRESENTED BY THE VICTIMS FROM HINKLEY, CA 92347 (THE VICTIMS ARE THOSE PER ATTACHED HERETO "VICTIMS FROM HINKLEY, CA 92347" SIGNATURE'S PAGES)

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9. Distinctively, it is incomprehensible the so called Study of Naturally Occurring Hexavalent Chromium, for which PG&E did cut a check to the Lahontan Regional Water Quality Control Board for Four Million Dollars, deposited in Board's account. The Victims has and are vigorously observing of what is Dr. Izbicky from USGS performing. Attempting to find the "illusionary" naturally occurring Hexavalent Chromium in Hinkley, CA 92347, thus reducing the strict legal liability for PG&E. In fact, the entire study is deemed by the Victims as incomprehensible, vague and ambiguous, further deemed as "junk science".

10. During all time, since August 2000, the Lahontan Regional Water Quality Control Board was strictly involved with the Hexavalent Chromium issue, and nothing meaningful was done to address the Arsenic-Uranium poisoning issue, triggering the Victims to believe that the drinking water within the aquifer beneath the entire town of Hinkley, CA 92347s was safe to drink and utilize for all other purposes.

11. Now, based upon intense investigation conducted by the Victims since September 2014, the circumstantial fact that the drinking water and all other potable waters within the aquifers beneath the entire town of Hinkley, CA 92347 was not safe to drink and use, since 2008.

12. The Victims has delivered, about ten days ago, 35 laboratory's containers with sampled water from the aquifers, within all locations the Victims real properties are situated to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Boulevard Suite 900, Los Angeles, CA 90017. WECK Laboratory, City of Industry, CA has contacted the Victims, disclosing receipt from the US EPA CID.

13. The Victims has delivered on June 15, 2015, 35 laboratory containers with sampled water from the aquifers within all locations the Victims real properties are situated, to Western Environmental Laboratory, Las Vegas, NV and the Exhibits referencing the Laboratories are attached hereto this paper.

14. Upon received results from said laboratories of the tested drinking water exhibits of being poisoned with Arsenic at concentration greater than the maximum legal limit of 10 ppb (parts per billion), and Uranium at concentration greater than 20 pCi/L (picocurie per liter) or 30 ug/L (micrograms per liter), the Victims will press charges against Pacific Gas and Electric Company (PG&E) with all law enforcement agencies, charged with investigation and prosecution, and commence necessary actions to compel just and proper served to the Victims.

THE LEGAL ARENA

15. On, or about July 13, 2010, the issued water well permit to [REDACTED], CEO Ecosystem Solar Electric Corp., by the County of San Bernardino Department of Health, stipulated that the ground water beneath the [REDACTED] real property must not be used for the proposed solar thermal electric power plant.

16. Such stipulation, based upon further investigation, revealed that since the ground water contained Hexavalent Chromium, previously utilized as a corrosion inhibitor by PG&E, can be re-utilized by [REDACTED] solar-thermal electric power plant and by other solar-thermal electric power producers, located next to Harper Dry Lake, County of San Bernardino, and obviously since [REDACTED] plant was smaller than the other, the other plant can now re-utilize such water that contains the corrosion inhibitor for their cooling towers. (PG&E is the purchaser of the power generated from said other solar-thermal electric power generating plant).

17. Such event triggered total economic loss to all investments made by [REDACTED] and caused [REDACTED] to take the appropriate actions, by launching massive investigation until June 8, 2015, of poisoned inhabitants within the town of Hinkley, CA 92347, with Hexavalent Chromium and recently, since September 10, 2014, poisoned with Arsenic and Uranium Victims.

18. On or about May 2013, [REDACTED] had at hand over 300 Victims and located the law firm Callahan & Blaine, who in turn, filed on June 2013 Class Action lawsuit against Pacific Gas and Electric Company (PG&E), Case No. CIVDS1308429.

19. Something unorthodox has happened with that Class Action, triggering 52 Victims to voluntary and temporarily withdraw themselves as Class Members, and to further file own lawsuits against Pacific Gas and Electric Company, a California corporation, on or about September 2014. (In all, 35 cases filed in the Superior Court County of San Bernardino).

20. Due to fact that the statute of limitations has long ago run out on the Hexavalent Chromium poisoning, and the fact that [REDACTED] has discovered that the aquifers beneath the Victims real properties were poisoned with Arsenic and/or Uranium (the new discovery within any statute of limitations), has now triggered the assignees of the Victims, to initiate actions seeking either new Class Action, or to litigate all individually.

### CONCLUSION

21. In the Legal Arena, in the Governmental Administrative Arena, in fact, in any arena, the issue of these controversy can only escalate to unprecedented proportion, if just and proper is not served to the all Victims, now approaching over one hundred.

22. The legal arena situated in the State of California is now approaching the status of being out of jurisdiction, due to pending Complete Diversity Jurisdiction.

23. The Governmental Administrative Arena, within the State of California, is now approaching to be substituted with the Federal Administrative Arena, due to not only exhausted administrative remedy by the Victims in the State of California, but on the ground of the "Federal Question", violation of the United States Safe Drinking Water Act (SDWA), with US EPA at the helm, due to inaction by the Cal EPA, Et Al State of California Regulatory Agencies, charged with oversight, investigation, enforcement and timely prosecution of the polluter-contaminator-discharger Pacific gas and Electric Company (PG&E), with the highly toxic and carcinogenic substances Arsenic and Uranium, in addition to the historic discharge of Hexavalent Chromium.

24. The attached hereto Volume of Exhibits, mostly evidentiary, disclosing the true facts, are in support thereof the Victims' presentation, which should be taken more than seriously by all, per the attached hereto Mailing List, in light of the upcoming massive investigation, that can result implications beyond borders.

25. Citing the voluntarily dismissed without prejudice, prior to trial and prior to hearings, of the 35 cases filed by the initial Victims against Pacific Gas and Electric Company, a California corporation, on one, of the several, grounds, in addition to the Complete Diversity Jurisdiction question :

"Justice is not served when, by a hypertechnical objection to a pleading or by a trivial imperfection in the choice of words, a litigant is deprived of his rights to have case submitted to the decision of a jury....." *Thomas v. Seaside Memorial Hospital* (1947) 80 Cal.App.2nd 841,851. "It is, of course, the policy of the law that legal controversy be disposed of on their merits and not upon technical ground of pleadings". *Metzger v. Bose* (1957) 155 Cal.App.2nd 131, 133.

During the investigation, and pendency of all actions, the Victims will be forwarding additional documentation.





EXHIBIT "D"





STATE WATER RESOURCES CONTROL BOARD  
REGIONAL WATER QUALITY CONTROL BOARDS

CALIFORNIA STATE



ENVIRONMENTAL LABORATORY ACCREDITATION PROGRAM

**CERTIFICATE OF ENVIRONMENTAL LABORATORY ACCREDITATION**

Is hereby granted to

**Western Environmental Testing Laboratory**

475 East Greg Street, # 119

Sparks, NV 89431

Scope of the certificate is limited to the  
"Fields of Testing"  
which accompany this Certificate.

Continued accredited status depends on successful completion of on-site,  
proficiency testing studies, and payment of applicable fees.

This Certificate is granted in accordance with provisions of  
Section 100825, et seq. of the Health and Safety Code.

Certificate No.: 2523

Expiration Date: 11/30/2016

Effective Date: 12/1/2014

Richmond, California  
subject to forfeiture or revocation

Christine Sotelo, Chief  
Environmental Laboratory Accreditation Program



CALIFORNIA STATE

ENVIRONMENTAL LABORATORY ACCREDITATION PROGRAM BRANCH

**CERTIFICATE OF ENVIRONMENTAL LABORATORY ACCREDITATION**

is hereby granted to

**Weck Laboratories, Inc.**

**Weck Analytical Environmental Services**

14859 East Clark Avenue

City of Industry, CA 91745

Scope of the certificate is limited to the  
Fields of Testing  
which accompany this Certificate

Conditional accredited status depends on successful completion of on-site  
proficiency testing studies and payment of applicable fees.

This Certificate is granted in accordance with provisions of  
Section 100925, et seq. of the Health and Safety Code.

Certificate No. 1132

Expiration Date 03/31/2016

Effective Date 04/01/14

100 Woodland Avenue  
Suite 100, Tustin, California 92680

  
David M. Mazza, P.E., Assistant Director, Chief  
Department of Drinking Water and Environmental Management



CALIFORNIA STATE

ENVIRONMENTAL LABORATORY ACCREDITATION PROGRAM BRANCH

**CERTIFICATE OF ENVIRONMENTAL LABORATORY ACCREDITATION**

Is hereby granted to

**Clinical Laboratory of San Bernardino, Inc.**

21881 Barton Road  
Grand Terrace, CA 92313

Scope of the certificate is limited to the  
"Fields of Testing"  
which accompany this Certificate.

Continued accredited status depends on successful completion of on-site,  
proficiency testing studies, and payment of applicable fees.

This Certificate is granted in accordance with provisions of  
Section 100825, et seq. of the Health and Safety Code.

Certificate No.: 1088

Expiration Date: 01/31/2016

Effective Date: 02/01/2014

Richmond, California  
subject to forfeiture or revocation

  
David Mazzera, Ph.D., Assistant Division Chief  
Division of Drinking Water and Environmental Management



WECK LABORATORIES, INC.

Analytical Laboratory Service - Since 1964

## Certificate of Analysis

Report Date: 09/23/14 15:37

Received Date: 09/04/14 12:07

Client: Water Investigations  
848 N. Rainbow Blvd., #122  
Las Vegas, NV 89107

Turnaround Time: Normal

Phone: (702) 301-4167

Fax:

P.O.#:

Attn: [REDACTED]

Project:

Dear [REDACTED]:

Enclosed are the results of analyses for samples received 9/4/2014 with the Chain of Custody document. The samples were received in good condition, at 2.9 °C. All analysis met the method criteria except as noted below or in the report with data qualifiers.

Work Order No: 4104036-01  
Sampled by: [REDACTED]

Sample ID: #1 (Chromium6)  
Sampled: 09/03/14 17:50

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Chromium 6+	2.2		ug/l	0.30	1	EPA 218.6	09/10/14 10:50	09/10/14 13:36	cwh	W410499

Work Order No: 4104036-02  
Sampled by: [REDACTED]

Sample ID: #2 (Chromium6)  
Sampled: 09/03/14 16:50

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Chromium 6+	0.49		ug/l	0.30	1	EPA 218.6	09/10/14 10:50	09/10/14 13:36	cwh	W410499

Work Order No: 4104036-03  
Sampled by: [REDACTED]

Sample ID: #3 (Chromium6)  
Sampled: 09/03/14 18:20

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Chromium 6+	ND		ug/l	0.30	1	EPA 218.6	09/10/14 10:50	09/10/14 13:36	cwh	W410499

Work Order No: 4104036-04  
Sampled by: [REDACTED]

Sample ID: #39 (Chromium6)  
Sampled: 09/03/14 15:55

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Chromium 6+	ND		ug/l	0.30	1	EPA 218.6	09/10/14 10:50	09/10/14 13:36	cwh	W410499

Work Order No: 4104036-05  
Sampled by: [REDACTED]

Sample ID: #1 Arsenic(Arsenic)  
Sampled: 09/03/14 18:10

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	2500		ug/l	0.80	1	EPA 200.8	09/15/14 08:51	09/15/14 19:18	ml	W410722

Work Order No: 4104036-06  
Sampled by: [REDACTED]

Sample ID: #2 Arsenic(Arsenic)  
Sampled: 09/03/14 17:15

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	34		ug/l	0.40	1	EPA 200.8	09/15/14 08:51	09/15/14 19:22	ml	W410722

Work Order No: 4104036-07  
Sampled by: [REDACTED]

Sample ID: #12 (Uranium)  
Sampled: 09/03/14 09:30

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium Rad	10		pCi/L	0.13	1	EPA 200.8	09/15/14 08:51	09/15/14 19:31	ml	W41203

Lab#: 4104036-08

Page 1 of 2

Exhibit A<sup>n</sup>

# Western Environmental Testing Laboratory

## QC Report

QCBatchID	QCType	Parameter	Method	Result	Units
QC15010189	Blank 1	Arsenic	EPA 200.8	0.0015	mg/L

QCBatchID	QCType	Parameter	Method	Result	Actual	% Recovery	Units
QC15010189	LCS 1	Arsenic	EPA 200.8	0.0528	0.050	106	mg/L

QCBatchID	QCType	Parameter	Method	Spike Sample	Sample Result	MS Result	MSD Result	Spike Value	Units	MS % Rec.	MSD % Rec.	RPD
QC15010189	MS 1	Arsenic	EPA 200.8	1412779-001	ND	0.0536	0.0536	0.050	mg/L	103	103	<1%

Customer Sample ID: [REDACTED]

Collect Date/Time: 12/16/2014 16:00

WETLAB Sample ID: 1412761-002

Receive Date: 12/23/2014 13:10

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	24	µg/L	1	1.0	1/6/2015	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		1/6/2015	NV00925

Customer Sample ID: DO-Y.K

Collect Date/Time: 12/16/2014 14:00

WETLAB Sample ID: 1412761-003

Receive Date: 12/23/2014 13:10

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	740	µg/L	1	1.0	1/6/2015	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		1/6/2015	NV00925

Customer Sample ID: DW-22-53

Collect Date/Time: 12/16/2014 08:45

WETLAB Sample ID: 1412761-004

Receive Date: 12/23/2014 13:10

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	37	µg/L	1	1.0	1/6/2015	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		1/6/2015	NV00925

DF=Dilution Factor, RL=Reporting Limit, ND=Not Detected or &lt;RL

**SPARKS**

475 E. Greg Street, Suite 119  
 Sparks, Nevada 89431  
 tel (775) 355-0202  
 fax (775) 355-0817  
 EPA LAB ID: NV00925 - ELAP No: 2523

**ELKO**

1004 Lamoille Hwy  
 Elko, Nevada 89801  
 tel (775) 777-9933  
 fax (775) 777-9933  
 EPA LAB ID: NV00926

**LAS VEGAS**

3230 Potosi Ave. Suite 4  
 Las Vegas, Nevada 89102  
 tel (702) 475-8889  
 fax (702) 622-2888  
 EPA LAB ID: NV00932

EXHIBIT A

# Clinical Laboratory of San Bernardino, Inc.



[Redacted] [Redacted] Barstow CA, 92311	Project: Routine Sub Project: Toxic Tort Towns / Hinkley Project Manager: [Redacted]	Work Order: 14H0183 Received: 08/04/14 17:05 Reported: 08/19/14
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**TOLEDO** 14H0183-08 (Water) Sample Date: 07/26/14 15:30 Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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Metals

Arsenic (As) SM3113-B 19 ug/L 2.0 10 08/11/14 08/11/14 1433025

**SARAY ORDAZ** 14H0183-09 (Water) Sample Date: 07/30/14 18:05 Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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Metals

Arsenic (As) SM3113-B 270 ug/L 20 10 08/15/14 08/18/14 1433586

**HOLCROFT** 14H0183-10 (Water) Sample Date: 07/30/14 14:00 Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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Metals

Arsenic (As) SM3113-B 350 ug/L 20 10 08/15/14 08/18/14 1433586

**JENKINS** 14H0183-11 (Water) Sample Date: 07/30/14 14:30 Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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Metals

Arsenic (As) SM3113-B ND ug/L 2.0 10 08/11/14 08/11/14 1433025

**BAIN** 14H0183-12 (Water) Sample Date: 07/30/14 16:30 Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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Metals

Arsenic (As) SM3113-B 140 ug/L 20 10 08/15/14 08/18/14 1433586

**LUCILLE RIDDLE COM** 14H0183-13 (Water) Sample Date: 07/31/14 10:00 Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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Metals

Arsenic (As) SM3113-B 66 ug/L 4.0 10 08/15/14 08/18/14 1433586

**MILLER** 14H0183-14 (Water) Sample Date: 07/31/14 10:30 Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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Metals

Arsenic (As) SM3113-B 470 ug/L 20 10 08/15/14 08/18/14 1433586

Exhibit "A"

EXHIBIT  
 47/L-8  
 44/L-3  
 427/L-89



# Clinical Laboratory of San Bernardino, Inc.



Barstow CA, 92311

Project: Routine  
Sub Project: Toxic Tort Towns / Hinkley  
Project Manager: [REDACTED]

Work Order: 14H0183  
Received: 08/04/14 17:05  
Reported: 08/19/14

## TOLEDO

14H0183-08 (Water)

Sample Date: 07/26/14 15:30

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B 19 ug/L 2.0 10 08/11/14 08/11/14 1433025

## SARAY ORDAZ

14H0183-09 (Water)

Sample Date: 07/30/14 18:05

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B 270 ug/L 20 10 08/15/14 08/18/14 1433586

## HOLCROFF

14H0183-10 (Water)

Sample Date: 07/30/14 14:00

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B 350 ug/L 20 10 08/15/14 08/18/14 1433586

## JENKINS

14H0183-11 (Water)

Sample Date: 07/30/14 14:30

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B ND ug/L 2.0 10 08/11/14 08/11/14 1433025

## BAIN

14H0183-12 (Water)

Sample Date: 07/30/14 16:30

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B 140 ug/L 20 10 08/15/14 08/18/14 1433586

## LUCILLE RIDDLE COM

14H0183-13 (Water)

Sample Date: 07/31/14 10:00

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B 66 ug/L 4.0 10 08/15/14 08/18/14 1433586

## MILLER

14H0183-14 (Water)

Sample Date: 07/31/14 10:30

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B 470 ug/L 20 10 08/15/14 08/18/14 1433586

EXHIBIT  
KM  
6-7/L-8  
6-4/L-3  
6-27/L-8  
Exhibit "A"

# Western Environmental Testing Laboratory

## QC Report

CBatchID	QCType	Parameter	Method	Result	Units							
C15010189	Blank 1	Arsenic	EPA 200.8	0.0015	mg/L							
CBatchID	QCType	Parameter	Method	Result	Actual	% Recovery	Units					
C15010189	LCS 1	Arsenic	EPA 200.8	0.0528	0.050	106	mg/L					
CBatchID	QCType	Parameter	Method	Spike Sample	Sample Result	MS Result	MSD Result	Spike Value	Units	MS % Rec.	MSD % Rec.	RPD
C15010189	MS 1	Arsenic	EPA 200.8	1412779-001	ND	0.0536	0.0536	0.050	mg/L	103	103	<1%

Customer Sample ID: [REDACTED]

Collect Date/Time: 12/16/2014 16:00

WETLAB Sample ID: 1412761-002

Receive Date: 12/23/2014 13:10

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	24	µg/L	1	1.0	1/6/2015	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		1/6/2015	NV00925

Customer Sample ID: DO-Y.K

Collect Date/Time: 12/16/2014 14:00

WETLAB Sample ID: 1412761-003

Receive Date: 12/23/2014 13:10

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	740	µg/L	1	1.0	1/6/2015	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		1/6/2015	NV00925

Customer Sample ID: DW-22-53

Collect Date/Time: 12/16/2014 08:45

WETLAB Sample ID: 1412761-004

Receive Date: 12/23/2014 13:10

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	37	µg/L	1	1.0	1/6/2015	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		1/6/2015	NV00925

DF=Dilution Factor, RL=Reporting Limit, ND=Not Detected or &lt;RL

EXHIBIT A<sup>11</sup>X<sup>7</sup>**SPARKS**

475 E. Greg Street, Suite 118  
 Sparks, Nevada 89431  
 tel (775) 355-0202  
 fax (775) 355-0817  
 EPA LAB ID: NV00925 - ELAP No: 2523

**ELKO**

1064 Lamoille Hwy  
 Elko, Nevada 89801  
 tel (775) 777-9933  
 fax (775) 777-9933  
 EPA LAB ID: NV00926

**LAS VEGAS**

3230 Poteris Ave. Suite 4  
 Las Vegas, Nevada 89162  
 tel (702) 475-8899  
 fax (702) 622-2868  
 EPA LAB ID: NV00932



WECK LABORATORIES, INC.

Analytical Laboratory Service - Since 1964

## Certificate of Analysis

Report Date: 09/09/14 08:37

Received Date: 08/28/14 13:32

Client: Water Investigations  
848 N. Rainbow Blvd., #122  
Las Vegas, NV 89107

Turnaround Time: Normal

Phone: (702) 301-4167

Fax:

P.O.#:

Attn: [REDACTED]

Project:

Dear [REDACTED]:

Enclosed are the results of analyses for samples received 8/28/2014 with the Chain of Custody document. The samples were received in good condition, at 4.9 °C. All analysis met the method criteria except as noted below or in the report with data qualifiers.

Work Order No: 4H28040-01  
Sampled by: [REDACTED]

Sample ID: Chromium (VI) #7  
Sampled: 08/27/14 16:20

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Chromium 6+	1.9		ug/l	0.30	1	EPA 218.6	09/03/14 10:00	09/03/14 15:37	cwh	W410098

Work Order No: 4H28040-02  
Sampled by: [REDACTED]

Sample ID: Uranium #7  
Sampled: 08/27/14 11:10

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	8.5		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:40	ml	W410209

Work Order No: 4H28040-03  
Sampled by: [REDACTED]

Sample ID: Uranium #19  
Sampled: 08/27/14 11:30

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	49		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:42	ml	W410209

Work Order No: 4H28040-04  
Sampled by: [REDACTED]

Sample ID: Uranium #38  
Sampled: 08/27/14 11:50

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	17		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:45	ml	W410209

Work Order No: 4H28040-05  
Sampled by: [REDACTED]

Sample ID: Uranium #39  
Sampled: 08/27/14 12:15

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	16		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:47	ml	W410209

Work Order No: 4H28040-06  
Sampled by: [REDACTED]

Sample ID: Uranium #28  
Sampled: 08/27/14 12:35

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	19		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:59	ml	W410209

Work Order No: 4H28040-07  
Sampled by: [REDACTED]

Sample ID: Uranium #21  
Sampled: 08/27/14 13:00

Matrix: Water  
Sample Note:

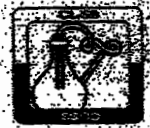
Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	30		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 15:14	ml	W410209

Lab#: 4H28040-09

Page 1 of 2

Exhibit A

# Clinical Laboratory of San Bernardino, Inc.



25633 Anderson Ave  
Barstow CA, 92311

Project: Routine  
Sub Project: Toxic Tort Towns / Hinkley  
Project Manager: [REDACTED]

Work Order: 14H0183  
Received: 08/04/14 17:05  
Reported: 08/19/14

## TOLEDO

14H0183-08 (Water)

Sample Date: 07/26/14 15:30

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B 19 ug/L 2.0 10 08/11/14 08/11/14 1433025

## SARAY ORDAZ

14H0183-09 (Water)

Sample Date: 07/30/14 18:05

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B 270 ug/L 20 10 08/15/14 08/18/14 1433586

## HOLCROFF

14H0183-10 (Water)

Sample Date: 07/30/14 14:00

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B 350 ug/L 20 10 08/15/14 08/18/14 1433586

## JENKINS

14H0183-11 (Water)

Sample Date: 07/30/14 14:30

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B ND ug/L 2.0 10 08/11/14 08/11/14 1433025

## BAIN

14H0183-12 (Water)

Sample Date: 07/30/14 16:30

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B 140 ug/L 20 10 08/15/14 08/18/14 1433586

## LUCILLE RIDDLE COM

14H0183-13 (Water)

Sample Date: 07/31/14 10:00

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B 66 ug/L 4.0 10 08/15/14 08/18/14 1433586

## MILLER

14H0183-14 (Water)

Sample Date: 07/31/14 10:30

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B 470 ug/L 20 10 08/15/14 08/18/14 1433586

Exhibit "A"

EXHIBIT

6-7/2-8  
4-4/2-3  
4-27/2-89



## Certificate of Analysis

Report Date: 10/20/14 14:06  
Received Date: 10/07/14 12:50Client: Water Investigations  
848 N. Rainbow Blvd., #122  
Las Vegas, NV 89107

Turnaround Time: 6 workdays

Phone: (702) 301-4167

Attn: [REDACTED]

Fax:

Project: Arsenic Testing

[REDACTED]

Dear [REDACTED]:

Enclosed are the results of analyses for samples received 10/7/2014 with the Chain of Custody document. The samples were received in good condition, at 1.3 °C and on ice. All analysis met the method criteria except as noted below or in the report with data qualifiers.

Work Order No: 4J07046-01  
Sampled by: Jack RosenSample ID: #16 Brown  
Sampled: 10/04/14 10:00Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	120		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:03	ml	W4J0456

Work Order No: 4J07046-02  
Sampled by: [REDACTED]Sample ID: Ken Nitao  
Sampled: 10/04/14 11:30Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	76		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:08	ml	W4J0456

Work Order No: 4J07046-03  
Sampled by: [REDACTED]Sample ID: #39 Jenkins  
Sampled: 10/04/14 13:00Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	3.9		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:12	ml	W4J0456

Work Order No: 4J07046-04  
Sampled by: [REDACTED]Sample ID: #13 Corby  
Sampled: 10/04/14 13:30Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	4.8		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:29	ml	W4J0456

Work Order No: 4J07046-05  
Sampled by: [REDACTED]Sample ID: #28 Charles Matthiesen  
Sampled: 10/04/14 14:30Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	210		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:34	ml	W4J0456

Work Order No: 4J07046-06  
Sampled by: [REDACTED]Sample ID: #37 Ramirez  
Sampled: 10/04/14 14:45Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	11		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:38	ml	W4J0456

Work Order No: 4J07046-07  
Sampled by: [REDACTED]Sample ID: #51 Robeling  
Sampled: 10/04/14 16:30Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	38		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:55	ml	W4J0456

Exhibit 'A'



WECK LABORATORIES, INC.

Analytical Laboratory Service - Since 1964

## Certificate of Analysis

Report Date: 09/09/14 08:37  
Received Date: 08/28/14 13:32Client: Water Investigations  
848 N. Rainbow Blvd., #122  
Las Vegas, NV 89107

Turnaround Time: Normal

Phone: (702) 301-4167

Attn: [REDACTED]

Fax: [REDACTED]

Project:

P.O.#:

Dear [REDACTED]:

Enclosed are the results of analyses for samples received 8/28/2014 with the Chain of Custody document. The samples were received in good condition, at 4.9 °C. All analysis met the method criteria except as noted below or in the report with data qualifiers.

Work Order No: 4H28040-01  
Sampled by: [REDACTED]Sample ID: Chromium (VI) #7  
Sampled: 08/27/14 16:20Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Chromium 6+	1.9		ug/l	0.30	1	EPA 218.6	09/03/14 10:00	09/03/14 15:37	cwh	W410098

Work Order No: 4H28040-02  
Sampled by: [REDACTED]Sample ID: Uranium #7  
Sampled: 08/27/14 11:10Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	8.5		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:40	ml	W410209

Work Order No: 4H28040-03  
Sampled by: [REDACTED]Sample ID: Uranium #19  
Sampled: 08/27/14 11:30Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	49		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:42	ml	W410209

Work Order No: 4H28040-04  
Sampled by: [REDACTED]Sample ID: Uranium #39  
Sampled: 08/27/14 11:50Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	17		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:45	ml	W410209

Work Order No: 4H28040-05  
Sampled by: [REDACTED]Sample ID: Uranium #39  
Sampled: 08/27/14 12:15Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	16		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:47	ml	W410209

Work Order No: 4H28040-06  
Sampled by: [REDACTED]Sample ID: Uranium #28  
Sampled: 08/27/14 12:35Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	19		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:59	ml	W410209

Work Order No: 4H28040-07  
Sampled by: [REDACTED]Sample ID: Uranium #21  
Sampled: 08/27/14 13:00Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	30		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 15:14	ml	W410209

Lab#: 4H28040-09

Page 1 of 2

Exhibit A

# Clinical Laboratory of San Bernardino, Inc.



Callahan & Blaine  
3 Hutton Centre Drive, Ninth Floor  
Santa Ana CA, 92707

Project: Drinking Water  
Sub Project: Irving  
Project Manager: Javier H. van Oordt

Work Order: 13H1419  
Received: 08/16/13 11:55  
Reported: 09/03/13

Irving

13H1419-01 (Water)

Sample Date: 08/16/13 8:00 Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MDL	MCL	Prepared	Analyzed	Batch	Qualifier
<b>Metals</b>										
Arsenic (As)	SM3113-B	30	ug/L	2.0	0.68	10	08/22/13	08/22/13	1334349	
Chromium (+6)	EPA 218.6	1.3	ug/L	1.0	0.14		08/16/13	08/19/13	1334014	
<b>Radiochemistry Analyses</b>										
Gross Beta	EPA 900.0	15	pCi/L	4.0		50	08/19/13	08/26/13	1330379	
Gross Beta Counting Error	EPA 900.0	3.2	pCi/L				08/19/13	08/26/13	1330379	
Gross Beta Min Det Activity	EPA 900.0	2.2	pCi/L				08/19/13	08/26/13	1330379	
Uranium	EPA 908.0	70	pCi/L	1.0		20	08/20/13	08/20/13	1333313	
Uranium Counting Error	EPA 908.0	3.5	pCi/L				08/20/13	08/20/13	1333313	
Uranium Min Det Activity	EPA 908.0	0.88	pCi/L				08/20/13	08/20/13	1333313	

J Detected below the Reporting Limit; reported concentration is estimated; (J-Flag)

ND Analyte NOT DETECTED at or above the MDL; Method Detection Limit

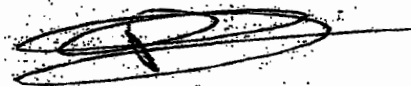
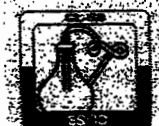
  
Robin Glenney  
Project Manager

EXHIBIT "A-E"

Page 1 of 1

# Clinical Laboratory of San Bernardino, Inc.



<b>Barstow CA, 92311</b>	Project: Routine Sub Project: Hinkley Project Manager: <b>[REDACTED]</b>	Work Order: 14H0251 Received: 08/06/14 08:20 Reported: 08/28/14
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**Robert Richards**      **14H0251-01 (Water)**      Sample Date: 08/05/14 11:08      Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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## Metals

Arsenic (As)	SM3113-B	73	ug/L	4.0	10	08/20/14	08/20/14	1434256	
Chromium (+6)	EPA 218.6	ND	ug/L	1.0	10	08/06/14	08/07/14	1432413	

**Paul Morehouse**      **14H0251-02 (Water)**      Sample Date: 08/05/14 12:11      Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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## Metals

Arsenic (As)	SM3113-B	19	ug/L	2.0	10	08/11/14	08/11/14	1433025	
Chromium (+6)	EPA 218.6	ND	ug/L	1.0	10	08/06/14	08/07/14	1432413	

**Contreras**      **14H0251-03 (Water)**      Sample Date: 08/05/14 12:55      Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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## Metals

Arsenic (As)	SM3113-B	748	ug/L	50	10	08/20/14	08/20/14	1434256	
Chromium (+6)	EPA 218.6	ND	ug/L	1.0	10	08/06/14	08/07/14	1432413	

**Barbara Allen**      **14H0251-04 (Water)**      Sample Date: 08/05/14 13:43      Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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## Metals

Arsenic (As)	SM3113-B	ND	ug/L	2.0	10	08/11/14	08/11/14	1433025	
Chromium (+6)	EPA 218.6	ND	ug/L	1.0	10	08/06/14	08/07/14	1432413	

ND      Analyte NOT DETECTED at or above the reporting limit

**Robin Glenney**  
Project Manager

Exhibit "A"



1 Ruben A. Castellón (SBN 154610)  
2 Alastair F. Hamblin (SBN 282044)  
3 CASTELLÓN & FUNDERBURK LLP  
4 811 Wilshire Boulevard, Suite 1025  
5 Los Angeles, California 90017  
6 Telephone: (213) 623-7515  
7 Facsimile: (213) 532-3984  
8 rcastellon@candffirm.com  
9 ahamblin@candffirm.com

10 Attorneys for Defendant Pacific Gas and Electric Company

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**SUPERIOR COURT OF CALIFORNIA**  
**COUNTY OF SAN BERNARDINO**

██████████, an individual and DOES, 1  
through 50, inclusive,

Plaintiffs,

vs.

PACIFIC GAS AND ELECTRIC  
COMPANY, a California Corporation; and  
DOES 1 through 50 inclusive,

Defendants.

Case No. CIVDS1416980  
Assigned for all purposes to:  
The Hon. David Cohn

**PACIFIC GAS AND ELECTRIC  
COMPANY'S MEMORANDUM OF  
POINTS AND AUTHORITIES  
REGARDING THE PLAINTIFF'S RIGHT  
TO DISMISS AN ACTION WHEN  
DISPOSITIVE MOTIONS ARE PENDING**

Date: June 25, 2015  
Time: 8:30 a.m.  
Dept.: S37

1 Pursuant to the Court's June 1, 2015 Order, Defendant Pacific Gas and Electric Company  
2 ("PG&E") hereby submits this memorandum of points and authorities regarding a plaintiff's right  
3 to voluntarily dismiss an action when a dispositive motion is pending. Pursuant to California  
4 law, the Court should deny Plaintiff [REDACTED] ("Plaintiff") request for dismissal without  
5 prejudice because dismissal pursuant to the demurrer is inevitable. Moreover, the filing of the  
6 request for dismissal is an improper tactical ploy that will not resolve this action and only serve  
7 to prejudice PG&E and further burden the Court system.

8 Based on the following discussion, PG&E requests that the Court deny Plaintiff's request  
9 for dismissal and proceed with the hearing on PG&E's demurrer and motion to strike. In  
10 addition, PG&E requests that the Court grant the demurrer and motion to strike in their entirety  
11 because they are unopposed.

#### 11 I. FACTUAL BACKGROUND

12 On May 1, 2015, Plaintiff filed the operative second amended complaint ("SAC") in this  
13 action. At a hearing before the Court on May 5, 2015, Judge Cohn addressed Plaintiff's SAC  
14 and indicated that there was sufficient basis to grant a demurrer to the SAC. Judge Cohn noted  
15 that the SAC was insufficient and contained improper material. See Declaration of Ruben A.  
16 Castellón ("Castellón Decl."), para 3.

17 Following the Court hearing, Nick Panchev, self-appointed spokesperson for all of the 35  
18 pro per cases pending before this Court, spoke with Ruben Castellón, counsel for PG&E. During  
19 this conversation [REDACTED] and informed him that the plaintiffs in each of the 35 pro per cases  
20 were considering dismissing these actions and filing them in federal Court pursuant to diversity  
21 jurisdiction. See Castellón Decl., para. 4.

22 In a letter to [REDACTED], dated May 27, 2015, the Lahontan Regional Water Quality Control  
23 Board ("Water Board") identified several communications made by [REDACTED] that took place on  
24 April 30, 2015 and May 4, 6, and 7, 2015. See Castellón Decl., para. 5. [REDACTED] letters and  
25 emails contained multiple statements regarding his intent to seek redress in federal court in states  
26 other than California. For example, in one communication to the Water Board, after identifying  
27 several employees of various state and local public and environmental health agencies, [REDACTED]  
28 states, "it could be ruled inappropriate for those officials to testify as an expert witness, or in any  
other capacities, before any United States District Court, in states other than the State of

1 California. (Many of [the pro per plaintiffs], per Signatures Pages, have, or are about to have  
2 their domicile in another state. (Complete Diversity Jurisdiction ... triggers new venue.)” See  
3 Castellón Decl., para. 6. In another communication, [REDACTED] declares “since there is no threat of  
4 litigation against the Water Board, and since there will be no litigation in any State of California  
5 Superior Courts, not only against the Water Board, but against PG&E (not in any Courts within  
6 State of California), (there is high probability that PG&E will be litigated in many US District  
7 Courts, in many States in the U.S. other than in the state of California).” See Castellón Decl.,  
8 para. 7.

9 On May 20, 2015 PG&E filed and served a demurrer to the SAC (“Demurrer”) and a  
10 motion to strike portions of the SAC (“MTS”). See Castellón Decl., para. 8. The Demurrer  
11 specifically requested dismissal of Plaintiff’s entire action with prejudice. *Id.* The Demurrer and  
12 MTS are currently set for hearing on June 25, 2015. *Id.*

13 On May 22, 2015, Plaintiff filed a request for dismissal without prejudice (“Request”).  
14 The Request states that Plaintiff seeks dismissal of PG&E “due to complete diversity  
15 jurisdiction.” See Castellón Decl., para. 9.

16 Around the time of the filing of the Plaintiff’s Request a number of the pro per plaintiffs  
17 began filing notices of change of address. See Castellón Decl., para. 10. These forms indicated  
18 that several of the plaintiffs now maintain addresses outside of the state of California. *Id.*

19 On June 1, 2015, the Court issued a minute order entitled “Further Order on Dismissed  
20 PG&E Cases” (“Minute Order”). In the Minute Order the Court stated the following:

21 The law is unclear whether plaintiff had an absolute right to dismiss an action  
22 when a dispositive motion is pending. ... In light of the uncertainty in the law, the  
23 Court will entertain argument on the issue at the scheduled hearing on 6/25/15 at  
24 8:30 a.m.

25 PG&E now submits this memorandum of points and authorities regarding Plaintiff’s right  
26 to dismiss this action when PG&E’s dispositive motions are pending.

## 27 **II. LEGAL ANALYSIS**

28 Plaintiff’s right to dismiss their action is based on section 581 of the California Code of  
Civil Procedure. It is clear that, while a plaintiff’s right to dismiss is generally upheld it is by no  
means absolute. The question of whether a plaintiff may dismiss an action when a dispositive  
motion is pending has been considered in a number of cases and the decision is generally based  
on the timing of the request in relation to the status of the motion. It is also clear that California

1 Court's will deny a plaintiff's request for dismissal when it is clear that the dismissal is a tactical  
2 ploy, including a plaintiff's attempt to avoid an inevitable ruling.

3 Here, the Plaintiff's conduct preceding the filing of the Request and the information  
4 contained within the Request make it clear that the dismissal is simply a tactical ploy. Plaintiff  
5 does not truly intend to dismiss the action but will seek to bring his claims in a forum that he  
6 believes offers a better chance of success. Meanwhile, PG&E has expending significant sums  
7 defending Plaintiff's claims already and will only be subjected to additional costs. Moreover,  
8 PG&E and the Court system will continue to be burdened by Plaintiff's claims. This is an  
improper outcome and Plaintiff's Request should be denied.

9 **A. Applicable Law**

10 California Code of Civil Procedure § 581 states that:

11 An action may be dismissed in any of the following instances:

12 (1) With or without prejudice, upon written request of the plaintiff to the clerk,  
13 filed with papers in the case, or by oral or written request to the court at any time  
before the actual commencement of trial, upon payment of the costs, if any.

Cal. Code. Civ. Proc. § 581

14 California cases hold that a plaintiff's right to dismiss the action without prejudice may  
15 be cut off where a dispositive motion is pending, before any ruling thereon, if the dismissal  
16 appears to be a tactical ploy. See *Hardbrodt v. Burke* (1996) 42 Cal.App.4<sup>th</sup> 168, 175 (request for  
17 dismissal without prejudice filed day before hearing on motion for terminating sanction in  
18 discovery dispute; *Cravens v. State Board of Equalization* (1997) 52 Cal.App.4<sup>th</sup> 253, 257  
19 (request for dismissal without prejudice filed after expiration of time to file opposition to motion  
for summary judgment); See also *Mary Morgan, Inc. v. Melzark* (1996) 49 Cal.App.4<sup>th</sup> 765, 770.

20 In the case *Wells v. Marina City Properties, Inc.*, 29 Cal.3d 781 (1981), the Court  
21 considered the issue of whether a plaintiff should be allowed to dismiss the case and refile in  
22 another Court after failing several attempts to amend his complaint to satisfy the Court that a  
23 cause of action was stated. The *Wells* Court held that "[t]o accept his present argument... would  
24 allow him to reassert the same allegations in still another complaint, seeking a more favorable  
25 ruling from another court, rather than to proceed in a more appropriate, expeditious and final  
26 course to appeal on the legal sufficiency of those allegations. The obvious consequence of such a  
27 statutory construction would be to prolong, rather than to terminate, lawsuits. It would not serve  
28 the orderly and timely disposition of civil litigation. No good reason appears why

1 encouragement should be given to such tactics, the effect of which is to expose the defendants to  
2 duplicative 'annoying and continuous litigation,' to burden our trial court with 'fruitless'  
3 proceedings, and to delay the ultimate resolution of the validity of the plaintiff's pleading."  
4 *Wells* at 788-789. The *Wells* Court continued, stating "[o]ur interpretation of Section 581 does  
5 not deny a plaintiff his day in court. It simply requires that he frame his allegations in order to  
6 state a cause of action; and if a plaintiff is unable to do so after an adequate and reasonable  
7 opportunity is afforded, he must proceed to a review of such legal determination by appeal, rather  
8 than seek another trial forum in which to reassert the same claims." *Id.*

9 In the case, *Law Offices of Andrew L. Ellis v. Yang*, 178 Cal. App. 4th 869 (Cal. App. 2d  
10 Dist. 2009), the Court noted that "[u]ntil recently, the cases have not presented a completely clear  
11 or cohesive test to describe which situations deprive plaintiffs of their right to voluntarily dismiss  
12 their cases, nor have the cases articulated a precise rule providing guidance in all circumstances.  
13 However, recent authority suggests parties are not permitted to voluntarily dismiss their actions  
14 ... when the procedural posture is such that it is inevitable the plaintiff will lose. After such  
15 occurrences, these cases hold that plaintiffs lose their right to voluntarily dismiss their case."  
16 *Yang*, at 8 [REDACTED]

17 **B. Plaintiff's Loss is Inevitable and, As Such, Plaintiff has Lost His Voluntary**  
18 **Right to Dismiss**

19 Based on the facts, Plaintiff's dismissal of the case is clearly an attempt to avoid the  
20 inevitable – that he will lose. Plaintiff has been the subject of a previous successful demurrer  
21 filed by [REDACTED]. During the Court hearing on PG&E's demurrer to the first amended complaint  
22 the Court stated that it would likely be open to granting a demurrer without leave to amend as to  
23 a second amended complaint if the second amended complaint was insufficient. PG&E has filed  
24 another demurrer as to Plaintiff's SAC and there is every indication that PG&E will once again  
25 be successful, including comments from the Court regarding the insufficiency of the SAC. Based  
26 on the foregoing, an order granting PG&E's demurrer to the SAC without leave to amend  
27 appears to be inevitable. Based on California law, when the procedural posture is such that it is  
28 inevitable the plaintiff will lose, such as it appears here, the plaintiff's right to voluntarily dismiss  
the case is cut off. As such, Plaintiff's Request should not be granted and the Court should allow  
PG&E to proceed with its demurrer and motion to strike regarding the SAC.

1           **C. Plaintiff's Request for Dismissal is a Tactical Ploy and Plaintiff Should Not**  
2           **be Permitted to Dismiss the Case**

3           It is clear from the facts that Plaintiff's dismissal is a tactical ploy. Plaintiff intends to  
4           dismiss his action in this Court because he has had unfavorable rulings against past iterations of  
5           his complaint and it is obvious that a similar ruling may be issued in relation to the operative  
6           complaint. Plaintiff does not seek a dismissal in a final resolution of his claims but intends to  
7           attempt to obtain recovery in another forum at the expense of PG&E.

8           The facts herein are much like the facts in *Wells, supra*. Plaintiff has had multiple  
9           opportunities to amend his complaint to state sufficient facts to support his causes of action.  
10          Plaintiff continues to make the same missteps in relation to his pleadings and, based thereon,  
11          PG&E has filed a demurrer to Plaintiff's SAC. There is every indication that PG&E will once  
12          again be successful, including comments from the Court regarding the insufficiency of the SAC.  
13          It also appears that there is a likelihood that the Court may grant PG&E's demurrer without leave  
14          to amend. Plaintiff is aware of these facts and is now attempting to seek redress in another court  
15          through the act of forum shopping, a practice that is disapproved of by both state and federal  
16          courts<sup>1</sup>.

17          Plaintiff's intent to forum shop is established by the facts. [REDACTED] expressly stated that  
18          the pro per plaintiffs intended to dismiss the case in order to file it in federal Court. In Panchev's  
19          correspondence with the Water Board, he has made several representations about filing in federal  
20          court, including a statement that the pro per plaintiffs will be filing federal complaints in multiple  
21          states against PG&E. Based on his statements to the Water Board, [REDACTED] forum shopping is  
22          motivated by his desire to exclude the Water Board and the testimony of potential witnesses that  
23          he believes would hurt his case from participation in further actions against PG&E.

24          If Plaintiff wishes to bring a case in federal Court absent any federal claims he must  
25          establish diversity jurisdiction.<sup>2</sup> Following [REDACTED] statements several of the pro per plaintiffs  
26  
27  
28

<sup>1</sup> California law holds that Courts should not allow forum shopping. See *Henderson v. Superior Court*, 77 Cal. App. 3d 583, 593-594 (Cal. App. 2d Dist. 1978); *Appalachian Ins. Company v. Superior Court* (1984) 162 Cal.App.3d 427, 438; *Delfosse v. C.A.C.I., Inc.-Federal* (1990) 218 Cal.App.3d 683, 691. Also, in *Hanna v. Plummer*, 380 U.S. 460, the United States Supreme Court held that one of the aims of the *Erie* rule was to discourage forum-shopping. See *Hanna* at 468.

<sup>2</sup> Diversity jurisdiction allows federal courts to hear controversies "between Citizens of different States." U.S. Constitution, Art. III, § 2. "The district Courts shall have original jurisdiction of all civil actions where the matter in

1 filed notices indicating that they now maintain new addresses in states other than California.  
2 Furthermore, included in requests for dismissal filed by most of the pro per plaintiffs is the  
3 statement that dismissal is due because of "complete diversity jurisdiction." Plaintiff's ploy  
4 could not be more transparent. Plaintiff has no intention of resolving his claims through  
5 dismissal and, instead, intends to seek recovery in a forum he believes may be more favorable.

6 As the *Wells* Court indicated, motives such as the Plaintiff's should not be permitted to  
7 succeed. If Plaintiff's Request is granted it will only prolong, rather than terminate, the actions  
8 against PG&E. It also would not serve the orderly and timely disposition of civil litigation. The  
9 effect of granting the Request would prejudice PG&E by exposing it to duplicative, costly,  
10 annoying and continuous litigation, burden the court system with fruitless proceedings, and delay  
11 the ultimate resolution of the validity of the Plaintiff's pleading. Plaintiff has other options  
12 available to him, such as appealing any order regarding PG&E's demurrer. Therefore, Plaintiff's  
13 request for dismissal should be denied because it is a tactical ploy that will only burden and  
14 prejudice PG&E with further litigation.

15 **D. There is a Likelihood that Plaintiff Will Seek to Return His Claims to State**  
16 **Court in the Future**

17 There is a possibility that Plaintiff's attempt to seek redress in federal court will fail and  
18 Plaintiff will, once again, attempt to assert his claims against PG&E in state Court. Based on  
19 statements from [REDACTED] it appears the pro per plaintiffs intend to bring claims in federal Courts  
20 in several states. In pursuit of this end, Plaintiffs in 28 of the pro per cases have since filed  
21 notices of change of address. Only 22 of these notices identify addresses outside of California.  
22 This attempt to manufacture jurisdiction will only fail. [REDACTED]

23 Federal law clearly holds that it is improper to attempt to manufacture diversity  
24 jurisdiction. "There must be an actual, not pretended, change of domicile; in other words, the  
25 removal must be a real one, *animo manendi*, and not merely ostensible." *Morris v. Gilmer*, 129  
26 U.S. 315, 328 (internal citation omitted). The burden will fall to the plaintiffs that have noticed  
27 out of state addresses to prove that the new addresses are their place of domicile in order to  
28 establish that they are a citizen of that state. The party seeking to invoke federal jurisdiction  
bears the burden of demonstrating that the requirements of diversity are met. See *Pollution*

controversy exceeds the sum or value of \$75,000, and is between ...citizens of different States." 28 U.S.C. §



1 *Control Indus. Of America, Inc. v. Van Gundy*, 21 F.3d 152, 155. "A person's state citizenship is  
2 determined by their state of domicile, not their state of residence. A person is domiciled in a  
3 location where he or she has established a fixed habitation or abode in a particular place, and  
4 [intends] to remain there permanently or indefinitely." *Lew v. Moss*, (9<sup>th</sup> Cir. 1986) 797 F.2d  
5 747, 749-750 (internal quotations omitted). It has further been held that "domicile is generally a  
6 compound of physical presence plus an intention to make a certain definite place one's  
7 permanent abode." *Weible v. United State*, (9<sup>th</sup> Cir. 1957) 244 F.2d 158, 163. Based on the hasty  
8 manner in which the pro per plaintiffs served their notices of change of address, following  
9 [REDACTED] statements to Castellon and the Water Board, and the claims of diversity jurisdiction  
10 made in the requests for dismissal, it is unlikely that the pro per plaintiffs who have indicated a  
11 new state of residence will be able to establish that they are, in fact, citizens of those states.

12 Based on the foregoing, there is a high likelihood that Plaintiff's ploy to seek redress in  
13 federal court will be defeated. If this happens, Plaintiff may, at some point in the future, attempt  
14 to refile his action against PG&E in state court. This result must not be permitted. As such,  
15 PG&E requests that the Court deny the Request and hear PG&E's demurrer and motion to strike.

### 16 **III. PG&E'S DEMURRER AND MOTION TO STRIKE SHOULD BE GRANTED**

17 As discussed above, Plaintiff's Request should be denied. PG&E Requests that the Court  
18 hear its Demurrer and MTS. PG&E's Demurrer and MTS ~~strike~~ are unopposed and, therefore,  
19 they should be granted on the grounds stated therein.

20 PG&E's Demurrer is also supported by the Water Board's May 27, 2015 letter to  
21 [REDACTED] See Castellon Decl., para. 5. In the letter the Water Board discusses the basis of  
22 Plaintiff's claims at length. The Water Board notes that it has never established that PG&E is  
23 responsible for the presence of arsenic or uranium in Hinkley's ground water. It is stated that  
24 these constituents are present in the Hinkley area in a higher concentration than is usually found.  
25 Moreover, the Water Board notes that movement of these constituents could be caused by  
26 agricultural practices that have been employed for decades in the Hinkley area by entities other  
27 than PG&E.



1 The Water Board also contradicts the basis of Plaintiff's claims related to the  
2 concealment of facts by identifying multiple documents produced by PG&E, dating back to 2012,  
3 as well as multiple locations where additional documents are publicly available.

4 The Water Board's representations provide further support for PG&E's position that  
5 Plaintiff's claims are factually insufficient. Based on the lack of factual support for Plaintiff's  
6 claims, dismissal without leave to amend is appropriate.

#### 7 IV. CONCLUSION

8 California law holds that a plaintiff does not maintain a right to dismiss an action when a  
9 loss is inevitable or when the request for dismissal is a tactical ploy. Both of these elements are  
10 present here. Plaintiff understands that a dismissal without leave to amend pursuant to PG&E's  
11 demurrer is inevitable and Plaintiff is attempting to circumvent that inevitability. In addition,  
12 Plaintiff's Request is made as a tactical ploy. Plaintiff wishes to dismiss this action and seek  
13 another forum in which to bring claims against PG&E. Working in conjunction with the other  
14 pro per plaintiffs, Plaintiff intends to bring multiple actions against PG&E in federal courts in  
15 several states outside of California. Plaintiff is motivated to seek a forum outside California by a  
16 stated desire to exclude the Water Board and other witnesses from future actions against PG&E  
17 in other states. Plaintiff's Request will not serve to complete this action but will only place  
18 further undue prejudice, burden and expense on PG&E and additional strain on the judicial  
19 system. California law prohibits such an outcome.

20 Based on the foregoing, PG&E requests that the Court deny the Request and proceed with  
21 the hearing on PG&E's Demurrer and MTS. Moreover, because the Demurrer and Motion to  
22 strike are unopposed, PG&E request that the Court grant both motions in their entirety and  
23 dismiss Plaintiff's SAC without leave to amend.

24 Dated: June 22, 2015

CASTELLÓN & FUNDERBURK LLP

25 By: 

Ruben A. Castellón

Alastair F. Hamblin

Attorneys for Pacific Gas and Electric  
Company



**EXHIBIT “3”**



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10 Attorneys for Defendant Pacific Gas and Electric Company

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**SUPERIOR COURT OF CALIFORNIA**  
**COUNTY OF SAN BERNARDINO**

██████████, an individual and DOES, 1  
through 50, inclusive,

Plaintiffs,

vs.

PACIFIC GAS AND ELECTRIC  
COMPANY, a California Corporation; and  
DOES 1 through 50 inclusive,

Defendants.

**Case No. CIVDS1416980**  
Assigned for all purposes to:  
The Hon. David Cohn

**PACIFIC GAS AND ELECTRIC  
COMPANY'S AMENDED  
MEMORANDUM OF POINTS AND  
AUTHORITIES REGARDING THE  
PLAINTIFF'S RIGHT TO DISMISS AN  
ACTION WHEN DISPOSITIVE  
MOTIONS ARE PENDING**

Date: June 25, 2015  
Time: 8:30 a.m.  
Dept.: S37

1  
2 Pursuant to the Court's June 1, 2015 Order, Defendant Pacific Gas and Electric Company  
3 ("PG&E") hereby submits this memorandum of points and authorities regarding a plaintiff's right  
4 to voluntarily dismiss an action when a dispositive motion is pending. Pursuant to California  
5 law, the Plaintiff, [REDACTED] ("Plaintiff") right to voluntarily dismiss this action is cut-off  
6 because the Plaintiff's request for dismissal without prejudice ("Request") is a tactical ploy that  
7 will not resolve this action. The facts, show that Plaintiff is engaged in the act of forum  
8 shopping. Case law holds that attempting to dismiss a case as a tactical ploy is improper and,  
9 specifically, when a Plaintiff requests a dismissal to engage in forum shopping it imposes an  
10 unnecessary burden on the defendant and the Court system and improperly prejudices the  
11 defendant.

12 To avoid undue prejudice, PG&E requests that if the Court confirms the dismissal of this  
13 action pursuant to Plaintiff's Request that the dismissal be **with prejudice**. In the alternative,  
14 PG&E requests that the Court proceed with the hearing on the demurrer and motion to strike  
15 Plaintiff's operative second amended complaint ("SAC") before rendering a decision regarding  
16 dismissal.

#### 16 I. FACTUAL BACKGROUND

17 On May 1, 2015, Plaintiff filed the SAC in this action. On May 20, 2015 PG&E filed and  
18 served a demurrer to the SAC ("Demurrer") and a motion to strike portions of the SAC ("MTS").  
19 See Castellón Decl., para. 3. The Demurrer specifically requested dismissal of Plaintiff's entire  
20 action with prejudice. *Id.* The Demurrer and MTS are currently set for hearing on June 25,  
21 2015. *Id.*

22 On May 22, 2015, Plaintiff filed the Request. The Request states that Plaintiff seeks  
23 dismissal of PG&E "due to complete diversity jurisdiction." Plaintiffs in all of the pro per cases  
24 pending in this Court also filed requests for dismissal and with the exception of two, they all  
25 cited "complete diversity jurisdiction" as the basis for their request for dismissal. Further,  
26 around the time of the filing of the Plaintiff's Request all but one of the pro per plaintiffs filed  
27  
28

1 notices of change of address. These forms indicate that several of the plaintiffs now maintain  
2 addresses outside of the state of California.

3 On June 1, 2015, the Court issued a minute order entitled "Further Order on Dismissed  
4 PG&E Cases" ("Minute Order"). In the Minute Order the Court stated the following:

5 The law is unclear whether plaintiff had an absolute right to dismiss an action  
6 when a dispositive motion is pending. ... In light of the uncertainty in the law, the  
7 Court will entertain argument on the issue at the scheduled hearing on 6/25/15 at  
8 8:30 a.m.

9 PG&E now submits this memorandum of points and authorities regarding Plaintiff's right  
10 to dismiss this action when PG&E's dispositive motions are pending.

11 **II. IF THE COURT ALLOWS PLAINTIFF TO DISMISS THE CASE, PG&E**  
12 **REQUESTS THAT THE DISMISSAL BE WITH PREJUDICE**

13 Plaintiff's right to dismiss their action is based on section 581 of the California Code of  
14 Civil Procedure. It is clear that, while a plaintiff's right to dismiss is generally upheld it is not  
15 absolute. There are several cases where California Courts have denied a plaintiff's request for  
16 dismissal when it is clear that the dismissal is a tactical ploy, including situations when a plaintiff  
17 attempts to dismiss a case with the intent to file it in another court.

18 Here, the contents of the requests to dismiss and notices of change of address filed by all  
19 of the pro per plaintiffs makes it clear that the requested dismissal is simply a tactical ploy.  
20 Plaintiff does not truly intend to dismiss the action but will seek to bring his claims in another  
21 forum. Meanwhile, PG&E has expending significant sums defending Plaintiff's claims already  
22 and, if dismissal is granted without prejudice PG&E will only be subjected to additional costs  
23 and undue prejudice. Moreover, PG&E and the Court system will continue to be burdened by  
24 Plaintiff's claims. This is an improper outcome. In order to avoid undue prejudice, PG&E  
25 requests that any dismissal be granted with prejudice.

26 **A. Applicable Law**

27 California Code of Civil Procedure § 581 states that:

28 An action may be dismissed in any of the following instances:

(1) With or without prejudice, upon written request of the plaintiff to the clerk,  
filed with papers in the case, or by oral or written request to the court at any time  
before the actual commencement of trial, upon payment of the costs, if any.  
Cal. Code. Civ. Proc. § 581

1 California cases hold that a plaintiff's right to dismiss the action without prejudice may  
2 be cut off where a dispositive motion is pending, before any ruling thereon, if the dismissal  
3 appears to be a tactical ploy. See *Hardbrodt v. Burke* (1996) 42 Cal.App.4<sup>th</sup> 168, 175 (request  
4 for dismissal without prejudice filed day before hearing on motion for terminating sanction in  
5 discovery dispute); *Cravens v. State Board of Equalization* (1997) 52 Cal.App.4<sup>th</sup> 253, 257  
6 (request for dismissal without prejudice filed after expiration of time to file opposition to motion  
7 for summary judgment); See also *Mary Morgan, Inc. v. Melzark* (1996) 49 Cal.App.4<sup>th</sup> 765, 770  
8 (voluntary dismissal not permitted after summary judgment hearing commenced and was  
continued to permit discovery).

9 In the case *Wells v. Marina City Properties, Inc.*, 29 Cal.3d 781 (1981), the Court  
10 considered the issue of whether a plaintiff should be allowed to dismiss the case and refile in  
11 another Court after failing several attempts to amend his complaint to satisfy the Court that a  
12 cause of action was stated. The *Wells* Court held that "[t]o accept his present argument... would  
13 allow him to reassert the same allegations in still another complaint, seeking a more favorable  
14 ruling from another court, rather than to proceed in a more appropriate, expeditious and final  
15 course to appeal on the legal sufficiency of those allegations. The obvious consequence of such a  
16 statutory construction would be to prolong, rather than to terminate, lawsuits. It would not serve  
17 the orderly and timely disposition of civil litigation. No good reason appears why  
18 encouragement should be given to such tactics, the effect of which is to expose the defendants to  
19 duplicative 'annoying and continuous litigation,' to burden our trial court with 'fruitless'  
20 proceedings, and to delay the ultimate resolution of the validity of the plaintiff's pleading."  
21 *Wells* at 788-789. The *Wells* Court continued, stating "[o]ur interpretation of Section 581 does  
22 not deny a plaintiff his day in court. It simply requires that he frame his allegations in order to  
23 state a cause of action; and if a plaintiff is unable to do so after an adequate and reasonable  
24 opportunity is afforded, he must proceed to a review of such legal determination by appeal, rather  
25 than seek another trial forum in which to reassert the same claims." *Id.*

26 **B. Plaintiff's Request for Dismissal is a Tactical Ploy and Plaintiff Should Not**  
27 **be Permitted to Dismiss the Case Without Prejudice**

28 Plaintiff's dismissal is a tactical ploy and, as such, the dismissal should be granted with  
prejudice, not without. Plaintiff intends to dismiss his action in this Court but he does not seek a



1 dismissal in a final resolution of his claims. Instead, Plaintiff intends to attempt to obtain  
2 recovery in another forum at the expense of PG&E. As will be explained below, the practice of  
3 forum shopping is improper and is disapproved of by both state and federal courts<sup>1</sup>. If Plaintiff is  
4 allowed to dismiss this case without prejudice and shop for a forum that he finds more suitable it  
5 could lead to extreme prejudice to PG&E and an incredible undue burden on the judicial system.

6 Plaintiff's intent to forum shop is established by the facts. All of the pro per plaintiffs,  
7 including Plaintiff, filed requests for dismissals. All but two of these requests stated that the  
8 grounds for dismissal was "due to complete diversity jurisdiction. Diversity jurisdiction is one of  
9 the two forms of jurisdiction that federal courts are required to have before they can hear a claim.  
10 Diversity jurisdiction allows federal courts to hear controversies "between Citizens of different  
11 States." U.S. Constitution, Art. III, § 2. "The district Courts shall have original jurisdiction of  
12 all civil actions where the matter in controversy exceeds the sum or value of \$75,000, and is  
13 between ...citizens of different States." 28 U.S.C. § 1332(a). It is clear that the pro per plaintiffs  
14 believe that diversity jurisdiction exists. It is also clear that there is no other reason to state that  
15 diversity jurisdiction exists unless the plaintiffs are attempting to establish federal diversity  
16 jurisdiction (i.e., plaintiffs are shopping for another forum for their claims).

17 Around the time the pro per plaintiffs began filing their requests for dismissal, change of  
18 address notices were filed in all but one of the pro per cases. Many of these notices indicated that  
19 the named plaintiffs now maintain new addresses in states other than California, including  
20 Nevada, Arizona, Colorado, Texas, South Carolina, and Washington. The remainder of notices  
21 received by PG&E (eight change of address notices identified on the docket were not received by  
22 PG&E) listed addresses in different counties of California. The majority of these notices were  
23 filed after the requests for dismissals were already filed. These change of address forms further  
24 confirm that the pro per plaintiffs intend to engage in forum shopping. Based on the statement in  
25 the requests for dismissal that complete diversity exists it is obvious that the concurrent mass  
26 filing of change of address notices is intended to support the manufacture of diversity

27 <sup>1</sup> California law holds that Courts should not allow forum shopping. See *Henderson v. Superior Court*, 77  
28 Cal. App. 3d 583, 593-594 (Cal. App. 2d Dist. 1978); *Appalachian Ins. Company v. Superior Court* (1984) 162  
Cal.App.3d 427, 438; *Delfosse v. C.A.C.I., Inc.-Federal* (1990) 218 Cal.App.3d 683, 691. Also, in *Hanna v.*

1 jurisdiction. There can be no other reason plaintiffs have noticed changes of address after the  
2 requests for dismissals were filed other than an attempt to establish diversity jurisdiction.

3 Plaintiff's ploy could not be more transparent. Aside from the fact that it is highly  
4 unlikely that all of the plaintiffs changed domicile at the same time, the facts support a theory  
5 that Plaintiff has no intention of resolving his claims through dismissal. Instead, the pro per  
6 plaintiffs, including Plaintiff, intend to seek recovery in different forums. In addition, given the  
7 above facts, it is clear that if all of the pro per plaintiffs are allowed to dismiss their cases without  
8 prejudice then they will likely file a multiplicity of actions against PG&E in other California state  
9 Courts and in federal Courts around the Country. PG&E will be faced with litigation in multiple  
10 jurisdictions and the cost of defending all of these cases will be extremely high. Moreover, the  
11 burden on the Court will be extensive and significant.

12 There is also a high possibility that the pro per plaintiffs' attempts to bring actions in  
13 federal court pursuant to diversity jurisdiction will fail. Federal law clearly holds that it is  
14 improper to attempt to manufacture diversity jurisdiction. "There must be an actual, not  
15 pretended, change of domicile; in other words, the removal must be a real one, *animo manendi*,  
16 and not merely ostensible." *Morris v. Gilmer*, 129 U.S. 315, 328 (internal citation omitted). The  
17 burden will fall to the plaintiffs that have noticed out of state addresses to prove that the new  
18 addresses are their place of domicile in order to establish that they are a citizen of that state. The  
19 party seeking to invoke federal jurisdiction bears the burden of demonstrating that the  
20 requirements of diversity are met. See *Pollution Control Indus. Of America, Inc. v. Van Gundy*,  
21 21 F.3d 152, 155. "A person's state citizenship is determined by their state of domicile, not their  
22 state of residence. A person is domiciled in a location where he or she has established a fixed  
23 habitation or abode in a particular place, and [intends] to remain there permanently or  
24 indefinitely." *Lew v. Moss*, (9<sup>th</sup> Cir. 1986) 797 F.2d 747, 749-750 (internal quotations omitted).  
25 It has further been held that "domicile is generally a compound of physical presence plus an  
26 intention to make a certain definite place one's permanent abode." *Weible v. United State*, (9<sup>th</sup>  
27 Cir. 1957) 244 F.2d 158, 163.

28  

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Plummer, 380 U.S. 460, the United States Supreme Court held that one of the aims of the *Erie* rule was to discourage  
forum-shopping. See *Hanna* at 468.

1 Based on the hasty manner in which the pro per plaintiffs served their notices of change  
2 of address, following the claims of diversity jurisdiction made in the requests for dismissal, it is  
3 unlikely that the pro per plaintiffs who have indicated a new state of residence will be able to  
4 establish that they are, in fact, citizens of those states. This will inevitably lead to more cases  
5 filed in California courts against PG&E once the federal actions are rejected, further burdening  
6 the Court system and prejudicing PG&E.

7 In the *Wells* case, the Court identified just such prejudice to the defendant and burden on  
8 the Court system as a reason for disallowing the plaintiff to dismiss without prejudice. In that  
9 case, the plaintiff's dismissal came after the plaintiff failed to amend its complaint in the time  
10 allowed following the defendant's successful demurrer but that should not change the outcome  
11 here. In the cases *Cravens* and *Melzark, supra*, the Court refused to grant a dismissal without  
12 prejudice when no final ruling had been made on pending dispositive motions, similar to the  
13 situation here. If the plaintiffs are allowed to engage in this tactical ploy and forum shop until  
14 they find individual forums with which they are each satisfied, PG&E will be faced with  
15 significant prejudice and an incredible burden that will be placed on both the state and federal  
16 court systems. The plaintiffs, on the other hand, will not lose any rights because they have  
17 already had multiple attempts to amend their complaint and they have repeatedly failed to state  
18 facts sufficient to state any actionable causes of action, as discussed in PG&E's Demurrer. As  
19 such, in order to prevent undue prejudice and a burden on the Court system, PG&E requests that  
20 the Court grant a dismissal, but with prejudice.

### 21 **III. IN THE ALTERNATIVE, PG&E'S DEMURRER AND MOTION TO STRIKE** 22 **SHOULD BE GRANTED**

23 As discussed above, in order to deter the use of dismissals as a tactical ploy and to avoid  
24 prejudice to PG&E and a burden on the Court system, the Court should grant a dismissal with  
25 prejudice. In the alternative, PG&E requests that the Court hear its Demurrer and MTS before  
26 making a ruling on the Request. PG&E's Demurrer establishes that Plaintiff has, once again,  
27 failed to state a cause of action. The Demurrer also requests a dismissal with prejudice. There  
28 are grounds stated in the demurrer for such an outcome. In addition, PG&E's Demurrer and  
MTS strike are unopposed and, therefore, they should be granted on the grounds stated therein.

1 As such, PG&E requests that the Court permit it the opportunity to have its Demurrer and MTS  
2 heard because there is a possibility that a ruling granting these motions could prevent significant  
3 future prejudice.

#### 4 IV. CONCLUSION

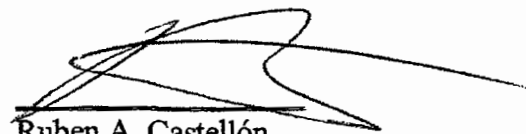
5 California law holds that a plaintiff does not maintain a right to dismiss an action when a  
6 request for dismissal is a tactical ploy. Plaintiff's Request is made as a tactical ploy. Plaintiff  
7 wishes to dismiss this action and seek another forum in which to bring claims against PG&E.  
8 Working in conjunction with the other pro per plaintiffs, Plaintiff intends to bring multiple  
9 actions against PG&E in federal courts in several states outside of California. Plaintiff's Request  
10 will not serve to complete this action but will only place further undue prejudice, burden and  
11 expense on PG&E and additional strain on the judicial system. California law prohibits such an  
12 outcome.

13 Based on the foregoing, PG&E requests that the Court grant dismissal with prejudice or,  
14 in the alternative, proceed with the hearing on PG&E's Demurrer and MTS. Moreover, because  
15 the Demurrer and Motion to strike are unopposed, PG&E request that the Court grant both  
16 motions in their entirety and dismiss Plaintiff's SAC without leave to amend.

17 Dated: June 24, 2015

CASTELLÓN & FUNDERBURK LLP

18  
19 By:



20 Ruben A. Castellón  
21 Alastair F. Hamblin  
22 Attorneys for Pacific Gas and Electric  
23 Company  
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PROOF OF SERVICE  
[C.C.P. § 1013, C.R.C. § 2008, F.R.C.P. Rule 5]

I, Skarleht Samayoa, state:

I am a citizen of the United States. My business address is 811 Wilshire Boulevard, Suite 1025 Los Angeles, CA 90017 I am employed in the City and County of Los Angeles where this mailing occurs. I am over the age of eighteen years and not a party to this action. On the date set forth below, I caused to be served the foregoing document described as:

**PACIFIC GAS AND ELECTRIC COMPANY'S MEMORANDUM OF POINTS AND  
AUTHORITIES REGARDING THE PLAINTIFF'S RIGHT TO DISMISS AN ACTION  
WHEN DISPOSITIVE MOTIONS ARE PENDING**

on the following person(s) in this action by FIRST CLASS MAIL addressed as follows:

Nick Panchev  
25633 Anderson Ave.  
Barstow, CA 92311  
Tel: 760-678-4708

: BY FIRST CLASS MAIL - I am readily familiar with my firm's practice for collection and processing of correspondence for mailing with the United States Postal Service, to-wit, that correspondence will be deposited with the United States Postal Service this same day in the ordinary course of business. I sealed said envelope and placed it for collection and mailing this date, following ordinary business practices.

: BY FACSIMILE - I caused said document to be transmitted by Facsimile machine to the number indicated after the address(es) noted above. (As courtesy copy only.)

: BY OVERNIGHT DELIVERY - I caused said document to be transmitted by Federal Express overnight delivery on the next business day to counsel at the address(es) noted above. (To Counsel for Defendants, deposited on [add date here] at 811 Wilshire Blvd., Suite 1025, Los Angeles, CA 90017-2606. Los Angeles, California)

X: BY PERSONAL SERVICE - ACE Attorney Service was directed to serve each envelope(s) by hand to the offices of the addressee(s).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed this date at Los Angeles, California.

June 24, 2015



\_\_\_\_\_  
Skarleht Samayoa



EXHIBIT “4”





VICTIMS TOWN OF HINKLEY  
Temporary Mailing Address  
Attn: [REDACTED] for ET AL  
[REDACTED]  
Pahrump, NV 89048

June 18, 2015

The Honorable Leondra R. Kruger  
Supreme Court of California  
350 McAllister Street  
San Francisco, CA 94102-4797

The Honorable Leondra R. Kruger:

The Victims are not seeking an opine, nor subject matter review from an appeal.

Just to let you know of what is transpiring in the Superior Court County of San Bernardino, State of California.

In Summary, the Victims, per attached hereto Volume, has voluntarily dismissed their cases, without prejudice, prior to trial, prior to hearings, prior to hearings on motions that should not be construed as being dispositive in the absence of conclusive hearing and in the absence of opportunity to file opposition by the adversary party, thus prejudicial to the Plaintiffs.

Per attached hereto cover page within said Volume, the Minutes are seeking from the Plaintiffs to execute Memorandum of Points and Authorities, thereafter entered dismissal, and it appears that the Court is asking them to appear on filed motion for demurer and striking of the Plaintiff's SAC, which was timely filed thereafter granted leave of court to amend, which was filed by the Defendant just two days before the dismissal and the Plaintiffs have not even received such Motion, nor aware of that paper content.

Said Minutes are citing just one "GENERALLY RYLAARSDAM, ET AL, CAL. PRAC. GUIDE: CIV. PRO. BEFORE TRIAL (TRG) 2014) 11:25-11:25.20, PP. 11-23-11-16 ((not construed as a majority to override).

Those Plaintiffs should not be subjected to entertain such an order, on the following grounds:

**Absolute right to dismiss:** Unless one of the exceptions below applies, plaintiff's right to dismiss anytime before trial is absolute. The clerk of the court has no discretion to refuse to enter the dismissal; and the court has no power to set it aside against plaintiff's will. [O'Dell v. Freightliner Corp. (1992) 10 CA4th 645, 659, 12 CR2d 774, 781] CCP § 581(b) treats equally dismissals with or without prejudice with respect to the right to dismiss before commencement of trial. [Kyle v. Carmon (1999) 71 CA4th 901, 909, 84 CR2d 303, 308]

**Procedure:** A voluntary dismissal, with or without prejudice, may be accomplished before trial simply by plaintiff's written request to the court clerk; or by oral or written request to the court. [CCP § 581(b)(1); see *Sanabria v. Embrey* (2001) 92 CA4th 422, 425-426, 111 CR2d 837, 838] FORM: Request for Dismissal (Judicial Council form 982(a)(5)). See Cal. Prac. Guide Civ. Pro. Before Trial FORMS (TRG). (1) [11:27a]

**Effective upon tender:** The clerk of the court has no power to refuse a request for dismissal. The dismissal is effective upon tender, and all subsequent proceedings are void (other than issues relating to court costs and fees). [*Aetna Cas. & Sur. Co. v. Humboldt Loaders, Inc.* (1988) 202 CA3d 921, 931, 249 CR 175, 181-182--immaterial that case had been consolidated for trial with another action]

**Not affected by 'fast track':** Plaintiff's right to dismiss is not subject to fast track statutes and rules. Thus, although plaintiff may refile following a dismissal without prejudice (which may have the same effect as a stay or continuance), the court cannot set the dismissal aside and order a dismissal with prejudice. [*Harris v. Billings* (1993) 16 CA4th 1396, 1403, 20 CR2d 718, 722]

**Commencement of trial:** The right to dismiss with or without prejudice exists 'at any time before the actual commencement of trial, upon payment of costs, if any.' [CCP § 581(b)(1)] Once 'trial' has commenced, a voluntary dismissal is generally allowed only with prejudice; see discussion at ¶ 11:28 ff. (But there are qualifications as to what constitutes 'commencement of trial'; see ¶ 11:18 ff.)

**Statutory definition:** Trial is deemed to 'actually commence at the beginning of the opening statement or argument of any party or his or her counsel, or if there is no opening statement, then at the time of the administering of the oath or affirmation to the first witness, or the introduction of any evidence.' [CCP § 581(a)(6)] (b) [11:17.2]

**Interpreted to include proceedings not normally considered trials:** Despite its precision, the statute is interpreted to encompass dispositive rulings before trial (see ¶ 11:18 ff.).

'Commencement of trial' is held to be 'illustrative rather than exclusive of the circumstances under which a trial has begun.' [*Gray v. Sup.Ct. (Hunter)* (1997) 52 CA4th 165, 171, 60 CR2d 428, 431 (emphasis added; internal quotes omitted)] 'Trial' includes 'the examination ... of the facts or law put in issue in a cause.' [*Gray v. Sup.Ct. (Hunter)*, supra, 52 CA4th at 171, 60 CR2d at 431 (emphasis added)] [11:17.3-17.4] Reserved.

**Dispositive rulings before trial:** Although the statute says the right to dismiss continues until 'actual commencement of trial,' that right is superseded by a ruling or determination that effectively disposes of plaintiff's case, thereby obviating the need for trial. [*Gray v. Sup.Ct. (Hunter)* (1997) 52 CA4th 165, 173, 60 CR2d 428, 433; *Malovec v. Hamrell* (1999) 70 CA4th 434, 441, 82 CR2d 712, 717, fn. 4--right to voluntarily dismiss without prejudice (or even with prejudice) terminated at time of court's ruling disposing of case]

**NO TACTICAL PLOY** Compare--dismissal after dispositive motion filed as tactical ploy: Several cases hold plaintiff's right to dismiss the action without prejudice may be cut off where a dispositive motion is pending, before any ruling thereon, if the dismissal appears to be a tactical ploy. [*Hartbrodt v. Burke* (1996) 42 CA4th 168, 175, 49 CR2d 562, 567--request for dismissal without prejudice filed day before hearing on motion for terminating sanction in discovery dispute; *Cravens v. State Board of Equalization* (1997) 52 CA4th 253, 257, 60 CR2d 436, 438--same, after expiration of time to file opposition to motion for summary judgment; see also *Mary Morgan, Inc. v. Melzark* (1996) 49 CA4th 765, 770, 57 CR2d 4, 7--voluntary dismissal not permitted after summary judgment hearing commenced and was continued to permit discovery] [11:25.11-25.14] Reserved.

**Voluntary Dismissal Is Not Appealable.** A voluntary dismissal under CCP §581 is not appealable. The entry of request for a dismissal is a ministerial, not judicial, act and no appeal lies from it. A willful dismissal without prejudice terminates that action for all time and afford the appellate court no jurisdiction to review motion made prior to dismissal. [*Gutkin v. University of Southern California*, 101 CA4th 967, 975, 125, CR2d 115, 121 (2002) .]

**Preclusive Effect.** Voluntary Dismissal Without Prejudice. By definition, a voluntary dismissal without prejudice is not a final judgment on the merits and therefore has no preclusive effect. [*Syufy Enterprises v. City of Oakland*, 104 CA4th 869, 897, 128 CR2d 808, 816, (2002).]

When plaintiff files a valid request for dismissal without prejudice, it has the right to refile the action. [*Zapata v. Universal Care, Inc.*, 107 CA4th 1167, 1174, 132 CR2d 842, 846-47 (2003).]

**No Demurrer taken under submission has occurred.** If demurrer is taken under submission, the California should require the clerk to notify the parties of the ruling, but such notification does not constitute service of notice of the court's decision or order described in CCP § 472b. See Cal Rules of Ct 3.1109(a)-(c).

**Timing:** The right to dismiss without prejudice expires upon 'the actual commencement of trial' (CCP § 581(b)). 'Trial' is interpreted broadly to include demurrers and motions that dispose of the litigation (see ¶ 11:18 ff.).

**No SLAPP dismissal:** If plaintiff voluntarily dismisses before the hearing on defendant's anti-SLAPP motion (see ¶ 7:207), the court cannot rule on the motion. Nevertheless, defendant is presumed to be the 'prevailing party' for purposes of attorney fees under the antiSLAPP statute (see ¶ 11:39.22a). 1.

**Plaintiff's Right to Dismiss Before Trial:** Subject to exceptions noted below, plaintiff has the absolute right to dismiss the action 'any time before the actual commencement of trial.' [CCP § 581(b)(1)]

**Where dispositive pretrial ruling pending?** It is unclear whether the mere pendency of a dispositive demurrer or motion cuts off plaintiff's 'absolute' right to dismiss without prejudice. The Supreme Court has stated in dictum: '(W)e note that such right of voluntary dismissal ... would also not be impaired prior to a decision sustaining the demurrer.' [Wells v. Marina City Properties, Inc. (1986) 29 C3d 781, 789, 176 CR 104, 109 (emphasis in original); see also Christensen v. Dewor Developments (1983) 33 C3d 778, 785, 191 CR 8, 12-13--plaintiff could dismiss without prejudice while demurrer to first amended complaint pending (§ 11:19.2)] The meaning and effect of this dictum is unclear: (a) [11:25.1] View that right to dismiss continues until ruling: Several cases interpret Wells to mean that the cut-off date on the right to dismiss without prejudice 'should run from some sort of ruling, at least when the motion to dismiss might be denied.' [M & R Properties v. Thomson (1992) 11 CA4th 899, 905, 14 CR2d 579, 582-583 (emphasis added); Kyle v. Carmon (1999) 71 CA4th 901, 912, 84 CR2d 303, 310--plaintiff may voluntarily dismiss after defendant files antiSLAPP motion and hearing is held, but before court rules on motion; Zapanta v. Universal Care, Inc. (2003) 107 CA4th 1167, 1173-1174, 132 CR2d 842, 846-847--voluntary dismissal filed before deadline for opposition to summary judgment motion was effective because 'case had not yet reached a stage where a final disposition was a mere formality']

**Tentative ruling as bar?** One case holds that as long as no actual ruling or order has been made, plaintiff can dismiss without prejudice even after learning of an adverse tentative ruling. [See Datner v. Mann Theatres Corp. of Calif. (1983) 145 CA3d 768, 771, 193 CR 676, 678]

**Terminates jurisdiction as to claims or parties dismissed:** As long as plaintiff has the right to dismiss voluntarily, the dismissal request must be given immediate effect. Except as noted below, a voluntary dismissal of an entire action deprives the court of both subject matter and personal jurisdiction. [Harris v. Billings (1993) 16 CA4th 1396, 1405, 20 CR2d 718, 723; Sanabria v. Embrey (2001) 92 CA4th 422, 425, 111 CR2d 837, 839-- dismissal effective immediately as to party dismissed although action continued as to other parties]

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**EXHIBIT “A”**



**POISONED AQUIFERS WITH ARSENIC AND URANIUM, ENTIRE TOWN OF HINKLEY, CA 92347**

POISONED WITH / CONCENTRATION	LATITUDE COORDINATES	LONGITUDE COORDINATES	AQUIFER #
URANIUM AT 70 pCi/L	34° 55' 58.20" N	117° 11' 55.46" W	1
ARSENIC AT 2,500 ppb	34° 54' 27.22" N	117° 10' 34.43" W	2
ARSENIC 130 ppb	34° 54' 41.49" N	117° 11' 16.92" W	3
ARSENIC AT 740 ppb Alleged area coordinates (applicable) therefrom adjacent area coordinates	34° 55' 45.35" N 34° 56' 09.70" N	117° 07' 21.99" W 117° 08' 08.19" W	6 88
ARSENIC AT 19 ppb	34° 55' 00.10" N	117° 13' 04.58" W	7
ARSENIC AT 270 ppb	34° 55' 59.31" N	117° 11' 57.13" W	8
URANIUM AT 35 pCi/L	34° 54' 40.11" N	117° 07' 07.49" W	10
ARSENIC AT 57 ppb	35° 00' 56.45" N	117° 12' 13.30" W	11
ARSENIC AT 34 ppb	35° 01' 43.44" N	117° 11' 51.61" W	12
ARSENIC AT 9.9 ppb	43° 56' 12.41" N	117° 14' 00.13" W	13
ARSENIC AT 350 ppb	35° 01' 55.43" N	117° 12' 19.21" W	14
ARSENIC AT 140 ppb	35° 01' 46.10" N	117° 12' 27.24" W	16
ARSENIC AT 73 ppb	34° 55' 24.01" N	117° 13' 15.34" W	19
ARSENIC AT 19 ppb	34° 56' 17.58" N	117° 09' 05.62" W	21
URANIUM AT 49 ug/L	34° 55' 12.82" N	117° 12' 39.47" W	22
URANIUM AT 70 pCi/L Alleged area coordinates (applicable) therefrom adjacent area coordinates	34° 55' 46.32" N 34° 55' 58.20" N	117° 11' 50.31" W 117° 11' 55.46" W	1 23
URANIUM AT 49 ug/L	34° 55' 12.82" N	117° 12' 39.47" W	24
URANIUM AT 49 ug/L	34° 55' 12.82" N	117° 12' 39.47" W	25

**POISONED AQUIFERS WITH ARSENIC AND URANIUM, ENTIRE TOWN OF HINKLEY, CA 92347**

POISONED WITH / CONCENTRATION	LATITUDE COORDINATES	LONGITUDE COORDINATES	AQUIFER #
ARSENIC AT 19 ppb	34° 59' 44.96" W	117° 12' 26.32" W	26
ARSENIC AT 470 ppb	34° 55' 40.25" N	117° 12' 12.61" W	27
ARSENIC AT 46 ppb	34° 55' 10.12" N	117° 13' 05.60" W	28
ARSENIC AT 150 ppb	34° 55' 04.54" N	117° 13' 04.59" W	29
ARSENIC AT 79 ppb	35° 02' 39.28" N	117° 12' 09.67" W	30
ARSENIC AT 19 ppb	34° 55' 06.02" N	117° 08' 37.94" W	33
ARSENIC AT 210 ppb	34° 56' 30.76" N	117° 10' 57.21" W	37
URANIUM AT 49 ug/L	34° 55' 12.82" N	117° 12' 39.47" W	38
ARSENIC AT 76 ppb	34° 54' 34.68" N	117° 11' 07.73" W	39
ARSENIC AT 11	34° 54' 41.74" N	117° 11' 12.13" W	51
ARSENIC AT 120 ppb	34° 56' 13.98" N	117° 11' 13.27 W	53
ARSENIC AT 140 ppb	34° 56' 20.65" N	117° 11' 09.40" W	57
ARSENIC AT 54 ppb	34° 56' 31.21" N	117° 11' 17.40" W	58
ARSENIC AT 24 ppb	34° 55' 32.75" N	117° 07' 07.86" W	61
ARSENIC AT 13 ppb	34° 51' 09.81" N	117° 11' 42.47" W	62
ARSENIC AT 30 ppb	34° 56' 10.70" N	117° 12' 00.25" W	78
ARSENIC AT 740 ppb	34° 56' 09.70" N 34° 55' 46.44" N	117° 08' 08.17" W 117° 07' 39.28" W	88
ppb – parts per billion for Arsenic	pCi/L - picocurie per liter and	ug/L – microgram per liter	for Uranium



**TABLE Test results by three analytical, state certified, laboratories of drinking water in aquifers beneath the real properties identified by APN, within the holding time**

No.	Victim's Name	Hinkley 92347 Address	APN	Aquifer Poisoned With	Concentration	Sample No.
1	Annette Airo	21256 Ash St.	0494-272-01	Uranium	70 pCi/L (western area)	1
2	Tonja and Craig Dishmon	22274 Community Blvd	0494-031-38	Arsenic	2,500 ppb (western area)	2
3	Lloyd and Barbara Vinson	36327 Hinkley Rd	0494-031-04	Arsenic	130 ppb (western area)	3
6	Nick Panchev (neighbor results)	37350 Lenwood Rd	0497-201-09	Arsenic	740 ppb (eastern area)	6
7	Moises Toledo / Juliana Martinez	36633 Hidden River Rd.	0494-163-08	Arsenic	19 ppb (western area)	7
8	Victor Suarez and Saray Ordaz	37531 Mulberry Rd	0494-272-02	Arsenic	270 ppb (western area)	8
10	William and Carolyn Bolin	36310 Lenwood Rd	0497-031-13	Uranium	35 pCi/L (eastern area)	10
11	Keith Hawes	42100 Friends St	0489-193-05	Arsenic	57 ppb (northern area)	11
12	Columbia Garza	21430 Tobacco Rd	0489-271-48	Uranium	34 ug/L (northern area)	12
13	Noel and Jane Corby	19660 Alcudia Rd	0495-161-09	Arsenic	9.8 ppb (western area)	13
14	Shirley Holcroft	21480 Brown Ranch Rd	0489-261-04	Arsenic	350 ppb (northern area)	14
16	Ronald Brown	42750 Orchard Rd	0489-182-08	Arsenic	140 ppb (northern area)	16
19	Robert Richards	20262 W. Hwy 58	0494-061-38	Arsenic	73 ppb (western area)	19
21	Herbert Nethery	23394 Alcudia Rd	0495-031-16	Arsenic	19 ppb (eastern area)	21
22	Alta Findley	36816 Hillview Rd.	0494-142-14	Uranium	49 ug/L (western area)	22
23	Clell Courtney (neighbor results)	Flower Rd.	0494-331-02	Uranium	70 pCi/L (western area)	23
24	Janet Shultz	36827 Hillview Rd	0494-143-22	Uranium	49 ug/L (western area)	24
25	Andrea Perry Williams	36796 Hillview Rd	0494-142-16	Uranium	49 ug/L (western area)	25
26	Norman/ Gary/ Olive Halstead	20455 Halstead Rd.	0489-193-31	Arsenic	19 ppb (northern area)	26
27	Robert Miller / Donna	37241 Sycamore St.	0494-092-06	Arsenic	470 ppb (western area)	27
28	Charles Matthiesen	36771 Hidden River Rd	0494-153-10	Arsenic	46 ppb (western area)	28
29	David Matthiesen	36709 Hidden River Rd	0494-163-10	Arsenic	150 ppb (western area)	29
30	Agustin Carrera	43595 Orchard Rd	0489-251-01	Arsenic	79 ppb (northern area)	30
33	Aurang Khan (neighbor results)	36693 Anson Ave	0494-241-27	Arsenic	24 ppb (eastern area)	33
37	John Ramirez	38006 Pueblo Rd	0495-073-10	Arsenic	210 ppb (central area)	37
38	Richard Heiser	36805 Hillview Rd	0494-143-21	Uranium	49 ug/L (western area)	38
39	Charles Jenkins /Darlene	21884 Catskill Rd	0494-031-77	Arsenic	76 ppb (western area)	39
51	Adolfo and Marina Riebeling	21818 Pioneer Rd	0494-031-49	Arsenic	11 ppb (western area)	51
53	Ken Nitao	37781 Hinkley Rd	0495-061-13	Arsenic	120 ppb (western area)	53
57	Jose Ornelas, Rosalba H	21825 Pera Rd	0495-062-04	Arsenic	140 ppb (western area)	57
58	Matsue Matthiesen	Hinkley Rd	0495-071-03	Arsenic	54 ppb (western area)	58
61	Gilberto/ Esperanza Velazquez	37136 Lenwood Rd	0497-211-41	Arsenic	24 ppb (eastern area)	61
62	Joel Christison	33245 Hinkley Rd	0420-071-13	Arsenic	13 ppb (southern area)	62
78	Oscar Urbina	2118 Santa Fe Ave.	0494-291-02	Arsenic	30 ppb (western area)	78
88	Kim and Min	37679 Dixie Rd	0497-201-01	Arsenic	740 ppb (eastern area)	88

**Poisoned Aquifers and poisoned within Drinking and Whole House Ground Waters with Hexavalent Chromium, based upon disclosure presented by Pacific Gas and Electric Company's Plume Map, located adjacent, or within, and beneath the real properties of Pacific Gas and Electric Company. (Codified into Law Maximum Contaminant Level (MCL) of 10 parts per billion (ppb), effective July 01, 2014, is applicable, as of date, to all owned real properties (over 300) by Pacific Gas and Electric Company, Hinkley, CA 92347**

<b>No.</b>	<b>Monitoring/Extraction Water Well</b>	<b>Result in ppb</b>	<b>No.</b>	<b>Monitoring/Extraction Water Well</b>	<b>Result in ppb</b>
1	SA-MW-05D	4600	51	MW-13	30
2	SA-MW-10D	2800	52	MW-145	29
3	SA-SM-02S	1900	53	MW-38B	28
4	MW-15	1420	54	CA-MW-411S	27
5	SA-MW-20D	1400	55	MW-179D	26
6	MW-11B	1400	56	MW-182S	25
7	SC-MW-26D	1100	57	MW-39D	23
8	MW-20	940	58	MW-28B	23
9	SA-SM-01S	780	59	X-16	23
10	SA-MW-11S	530	60	MW-10	27
11	SA-MW-09S	510	61	MW-109	22
12	SA-MW-06S	510	62	CA-MW-508D	20
13	PT2-MW-10	480	63	SA-SM-10D	18
14	SA-MW-07D	470	64	EX-29	19
15	SA-SM-08D	420	65	EX-15	18
16	SC-MW-21S	380	66	MW-28A	17
17	SA-MW-26S	380	67	MW-154-S1	17
18	SA-MW-21S	380	68	SA-SM-10D	18
19	PMW-03	340	69	CA-MW-506D	15
20	SC-MW-03D	330	70	EX-20	14
21	SA-MW-16D	330	71	CA-MW-510D	12
22	SA-MW-12S	330	72	MW-43	13
23	MW-118RD	290	73	MW-27A	12
24	MW-180RD	290	74	MW-50S	12
25	MW-193-S3	275	75	MW-41S	11
26	SA-MW-17S	270			
27	MW-178S	250			
28	SA-MW-04S	230			
29	MW-178D	170			

**Poisoned Aquifers and poisoned within Drinking and Whole House Ground Waters with Hexavalent Chromium, based upon disclosure presented by Pacific Gas and Electric Company's Plume Map, located adjacent, or within, and beneath the real properties of Pacific Gas and Electric Company. (Codified into Law Maximum Contaminant Level (MCL) of 10 parts per billion (ppb), effective July 01, 2014, is applicable, as of date, to all owned real properties (over 300) by Pacific Gas and Electric Company, Hinkley, CA 92347**

30	MW-36	130			
31	SC-MW-13S	120			
32	MW-17	120			
33	CA-MW-302D	110			
34	SA-MW-18D	100			
35	SA-SM-11D	96			
36	CA-MW-405D	94			
37	CA-MW-107D	89			
38	CA-MW-315D	78			
39	CA-MW-402S	77			
40	CA-MW-108S	70			
41	SC-MW-38D	65			
42	MW-42B2	47			
43	CA-MW-412D	45			
44	MW-193-S2	42			
45	MW-04	41			
46	MW-108S	36			
47	MW-03	35			
48	MW-42-B1	34			
49	MW-182D	33			
50	CA-MW-312D	32			



**EXHIBIT “B”**



## **FACTS**

### **FACTS ABOUT AQUIFER**

6. *An aquifer is an underground layer of water-bearing permeable rock or unconsolidated materials (gravel, sand, or silt) from which groundwater can be extracted using water well. The study of water flow in aquifers and the characterization of aquifers is called hydrogeology.*

### **FACTS ABOUT ABANDONEMENT OF AQUIFERS**

*If treatment or remediation of polluted groundwater is deemed to be difficult or expensive, then abandoning the use of aquifer's groundwater and finding an alternative source of water is the only other option.*

### **FACTS ABOUT LEGISLATION**

7. *In November 2006, the Environmental Protection Agency published the Ground Water Rule in the United States Federal Register. The EPA was worried that the ground water system would be vulnerable to contamination from fecal matter. The point of the rule was to keep microbial pathogens out of public water sources. The 2006 Ground Water Rule was an amendment of the 1996 Safe Drinking Water Act. The ways to deal with groundwater pollution that has already occurred can be grouped into the following categories: Containing the pollutants to prevent them from migrating further; removing the pollutants from the aquifer; remediating the aquifer by either immobilizing or detoxifying the contaminants while they are still in the aquifer (in-situ); treating the groundwater at its point of use; or abandoning the use of this aquifer's groundwater and finding an alternative source of water.*

### **FACTS ACCORDING TO UNITED STATES GEOLOGICAL SURVEY (USGS)**

*At link: [http://water.usgs.gov/nawqa/trace/pubs/gw\\_v38n4/](http://water.usgs.gov/nawqa/trace/pubs/gw_v38n4/)*

8. *"Concentrations of naturally occurring arsenic in ground water vary regionally due to a combination of climate and geology. Although slightly less than half of 30,000 arsenic analyses of ground water in the United States were  $\leq 1$   $\mu\text{g/L}$ , about 10% exceeded 10  $\mu\text{g/L}$ . At a broad regional scale, moderate to high arsenic concentrations appear to increase from east to west across the United States, although high concentrations exist in all physiographic provinces. Arsenic concentrations in ground water of the Appalachian Highlands and the Atlantic Plain generally are very low. Concentrations are somewhat greater in the Interior Plains and the Rocky Mountain System. Ground water in the Intermontane Plateaus and Pacific Mountain System of the western United States more commonly contains arsenic concentrations  $> 10$   $\mu\text{g/L}$  compared with that in the eastern physiographic provinces. Investigations during the last decade in New England, Michigan, Minnesota, South Dakota, Oklahoma, and Wisconsin suggest that moderate to high arsenic concentrations ( $> 10$   $\mu\text{g/L}$ ) are more widespread and common than previously recognized. "High" concentrations are defined as above the Environmental Protection Agency's established Maximum Contaminant Levels (MCLs) or other non-regulatory health-based levels for constituents or elements not having MCLs."*

9. *At Link: <http://www.mojavewater.org/files/HelendaleFaultStudy03-4069.pdf>*

*Page 41: "Arsenic concentrations in water from nine wells in the regional aquifer ranged from less than the detection limit of 2 to 130  $\mu\text{g/L}$  with a median concentration of 11  $\mu\text{g/L}$ "*

### **ACCORDING TO STAKEHOLDERS, AQUIFERS ARE ALSO "PRIVATE WATER SYSTEMS"**

10. *Typically, private water systems that serves more than 25 people at least 60 days of the year and have more than 15 service connections are regulated by the EPA. Polluted ground water could cause illness.*

### **FACTS ABOUT GROUND WATER AND DOMESTIC WATER WELL**

11. *When rain falls, much of it is absorbed into the ground. Water that's not used by plants moves downward through pores and spaces in the rock until it reaches a dense layer of rock. water trapped below the ground in the pores and spaces above the dense rock barrier is called ground water, and this is the water we get when we drill wells. Another common term for ground water is "aquifer" or "ground water aquifer."*

## FACTS ABOUT ARSENIC IN GROUND WATER

### Fact Sheet For Arsenic

12. *Per the State of California Lahontan Water Board Attachment G, Page 6, ... "the federal and state MCL for arsenic is 10 µg/L. The US Geological Survey conducted sampling for various constituents in wells in the Mojave Water Agency management area from 1991 to 1997, including wells in the Hinkley area. The study found arsenic in wells (up to 200 feet in depth) ranging from less than 1 µg/L to 12 µg/L with most concentrations under 10 µg/L. While the USGS study was conducted after the release of chromium from the Hinkley Compressor Station, sampling occurred before the use of carbon amendment injections to groundwater, and thus reflects levels prior to in-situ remediation". Thus, the In-Situ / Agricultural operations, implemented by PG&E, has subsequently caused (anthropogenic causation factor) the poisoning of ground waters with Arsenic, at substantially more than the average of 3 ppb for naturally occurring arsenic in ground waters, now found at almost all wells. Arsenic is released from a variety of anthropogenic sources (USEPA), including waste incineration. (not limited to industrial facility's cooling towers). These anthropogenic releases of arsenic can elevate environmental arsenic concentrations. Human exposure to arsenic can result in a variety of chronic and acute effects. In particular, there is evidence that associates chronic arsenic ingestion at low concentrations with increased risk of skin cancer, and that arsenic may cause cancers of the lung, liver, bladder, kidney, and colon (ATSDR, 1998). Because of the human health risks associated with arsenic, USEPA regulates the level of arsenic in drinking water at MCL of 10 ppb and Legal Reporting Limit at 2 ppb. [Mandatory]. (Anthropogenic Sources of Arsenic is from man-made sources, such as In-Situ and Agricultural Operations, implemented by PG&E in Hinkley, CA)*

## FACTS ABOUT URANIUM IN GROUND WATER

### Fact Sheet for Uranium

13. *The average concentration of uranium in the groundwater of the United States is about 2 pCi per liter (pCi/L). The average concentration in U.S. soils is about 2 pCi/g (3 ppm); The U.S. Environmental Protection Agency's (EPA) drinking water standard for uranium is 20 pCi/L (EPA 2009). Uranium present in the rocks and soil as a natural constituent represents natural background levels. Average Uranium Concentrations in Drinking Water for California was reported at average of 2.7 pCi/L (picocuries per liter). Gross beta particles are a form of radiation that can pollute drinking water when disturbances, such as In-Situ Remediation for Hexavalent Chromium is in place, which mobilizes radioactive minerals. Gross beta radiation is a known human carcinogen. Because any level of exposure to gross beta radiation can cause cancer, EPA has set a health goal of zero for this radioactive contaminant. Any exposure to this radioactive contaminant poses cancer risk. The maximum level set by EPA is at 15 pCi/L and the required by law disclosure on detection level is at 1 pCi/L. Therefore, anthropogenic (human activities, such as PG&E's In-Situ and Agricultural Treatment operations, are the cause for poisoning ground waters, not natural processes as the cause. Concentration for Uranium, greater than the background level (naturally occurring level) of 2.7 pCi/L must be immediately investigated by the regulatory governmental agencies. Concentration greater than the legal reporting limit of 1 pCi/L, trigger mandatory disclosure as required by law.*

## FACTS ABOUT SAMPLING OF GROUND WATER IN AQUIFER

14. *SAMPLING Two persons Required – "clean hand" and "dirty hand". No purging (rinsing well casing prior to sampling, since it will dilute and/or cause oxidation in event Arsenic and or Uranium are dissolved and/or in decay stage, and total, (not filtered) sample sent to analytical laboratory will indicate the true result. EPA Method of filtering a sample prior to laboratory's test, by injection tool with filter attached at the end, is construed as filtered sample, and water sample will not indicate the true reading of any toxic substance.*



## **FACTS ABOUT MOVEMENT OF GROUND WATER**

### **Fact Sheet For Ground Water Movement**

15. *Per UNITED STATES GEOLOGICAL SURVEY (USGS) "Water is recharged to the groundwater system by percolation of water from precipitation and then flows to the stream through the groundwater system". "Water pumped from the groundwater system causes the water table to lower and alters the direction of groundwater movement. Some water that flowed to the stream no longer does so and some water may be drawn in from the stream into the groundwater system, thereby reducing the amount of streamflow." "Contaminants introduced at the land surface may infiltrate to the water table and flow towards a point of discharge, either the well or the stream." "There are three types of movement of groundwater or the water table that we should be familiar with: percolation of infiltrated water, raising and lowering of the water table, and downslope flow of groundwater."*

*"Permeability is a measure of how fast water will flow through connected openings in soil or rock." "The capacity of soil or rock to hold water is called porosity." "Water seeping into an aquifer is known as recharge." "Groundwater that becomes trapped under impermeable soil or rock may be under pressure. This is called a confined or artesian aquifer." "Groundwater moves very slowly from recharge areas to discharge points. Flow rates in aquifers are typically measured in feet per day. Flow rates are much faster where large rock openings or crevices exist (often in limestone) and in loose soil, such as coarse gravel."*

*"Induced pressure in the aquifer's ground water is due to excessive pumping in connection therewith the In-Situ and Agricultural Treatment Operation, and creates unstable ground water movement in all directions, not just down gradient, and in such an event, the saturated areas in many aquifers beneath the town of Hinkley, CA 92347 is prone to receive poisonous substances at various times and at various concentration over the regulatory maximum legal limits. While, recharge or other hydrostatic pressure could alter the ground water movement, the fact that excessive pumping has occurred and is occurring, is the most certain cause for chaotic ground water movement, causing unprecedented cross contamination with toxic substances that were disturbed due to such excessive pumping, including but not limited to excessive irrigation of many alfalfa fields in Hinkley, CA 92347 resulted therefrom the In-Situ and Agricultural Treatment Operation. Other causes for chaotic movement of ground water saturated with disturbed and dissolved toxic substances are other, deemed as experimental methods, such as bioreactor and other, deemed as failed operations to remove the historic contamination of Hexavalent Chromium for 60-years, out of aquifers beneath Hinkley, CA 92347"*

## **FACTS ABOUT PURPORTED LOCKHART EARTHQUAKE FAULT**

### **Fact Sheet For Purported Lockhart Earthquake Fault**

16. *"Certain Earthquake Faults in California are undetermined and therefore construed as purported to exist, and are unconfined and have no surface expression (no surface trace like other certain faults), including but not limited to the Lockhart Earthquake Fault, purported to be located within the town of Hinkley, CA 92347, and therefore construed as not only highly speculative in regards to location in the town of Hinkley, CA 92347, but highly speculative as to cause impediment in ground water movement within the Hinkley, CA 92347 aquifers."*

According to California State University, Fullerton Department of Geological Sciences, Reports and Maps, link:[http://groundwater.fullerton.edu/Mojave\\_Water\\_Agency/Basin\\_Reports\\_files/Harper%20Lake%20Basin%20Watershed%20Report%20Final.pdf](http://groundwater.fullerton.edu/Mojave_Water_Agency/Basin_Reports_files/Harper%20Lake%20Basin%20Watershed%20Report%20Final.pdf), Page 21 Map, the purported Lockhart Earthquake Fault is not located in the town of Hinkley, CA 92347, and is at least 14-miles away from Hinkley, CA 92347, including but not limited to that there is no impediment to ground water movement in the aquifers within the town of Hinkley, CA 92347 further supported non-existence at Map of Page 158.

*"Substantial testing of aquifers in the town of Hinkley, CA 92347 was recently conducted and during 1968-1978 testing by Department of Interior, in the vicinity of the purported Lockhart Earthquake Fault and the facts remains that due to results of tests on each side of the purported Lockhart Earthquake Fault, yielded detection of toxic substances, including but not limited to recently detected Arsenic and Uranium"*

*"Any other scientific theory attempting to contradict such facts exhibited herein are construed as highly speculative and biased, and therefore inadmissible".*

## FACTS ABOUT AGRICULTURAL TREATMENT OPERATIONS AND IN-SITU OPERATIONS

### Fact Sheet For Agricultural Treatment Operations and In-Situ Operations

17. Based upon the facts described herein below, treatment technology for Chromium (VI), by the purported "Agricultural Treatment Operations and In-Situ Operations", more specifically described therein link:

*"[http://enr.uconn.edu/~baholmen/docs/ENVE290W/National%20Chromium%20Files%20From%20Luke/Cr\(VI\)%20Handbook/L1608\\_C08.pdf](http://enr.uconn.edu/~baholmen/docs/ENVE290W/National%20Chromium%20Files%20From%20Luke/Cr(VI)%20Handbook/L1608_C08.pdf), appear to be highly speculative, since removal of Chromium (VI) from ground drinking water is more difficult to remove, and there is no factual evidence that the Chromium (VI) is converted to Chromium (III) by implementation of purported "Agricultural Treatment Operations nor by the purported In-Situ Operation".*

#### ***"Treatment Technologies for Chromium(VI).***

***Hexavalent Chromium Cr(VI) is far more mobile than Cr(III) and more difficult to remove from water.***

*It is also the toxic form of Cr, presumably owing to the stronger oxidizing potential and membrane transport of Cr(VI) (Katz and Salem, 1992).*

*Typically, natural Cr concentrations are dwarfed by anthropogenic contamination. Dissolved concentrations of total Cr in groundwater from natural processes are typically below 10 mg/l (Richard and Bourg, 1991). A yellow color is imparted to the water at about 1 mg/l Cr(VI) (Palmer and Wittbrodt, 1991)*

***8.1.4 Physical Remediation Processes Chemical and biochemical processes render Cr(VI) unavailable by converting it to the less toxic and less mobile Cr(III) form.***

*Physical processes separate Cr(VI) from the contaminated media (such as groundwater extraction) capture the extracted Cr (using ion exchange resins or granular activated carbon (GAC)), and/or isolate the contamination."*

***8.2.3 Containment Other technologies focus on preventing the spread of contamination into larger areas.***

*These containment technologies include stabilization or solidification, biostabilization, phytostabilization, precipitation, encapsulation, and vitrification of soil. Slurry walls and other physical barriers are used for groundwater containment.*

*Passive in-situ remediation can be achieved by permeable reactive barriers, and hydraulic containment can be attained through pump-and-treat (this process may be enhanced by addition of surfactants).*

*Containment technologies focus on either isolating the contaminants (in the case of in-situ slurry walls) or immobilizing them.*

*Passive remediation may occur as groundwater leaves the containment zone, as in the case of permeable reactive barriers.*

*However, no attempt is made to decrease concentrations of Cr(VI) within the containment zone. In summary, remediation technologies focus on either decreasing toxicity (reducing Cr(VI) to Cr(III)), removing Cr from soil/groundwater or confining the Cr to a certain area.*

***8.5 Containment Technologies Containment technologies are used to either physically stop the spreading of groundwater plumes or to chemically immobilize contaminants in a nonexchangeable, insoluble form.***

*Most containment technologies are performed in-situ, with the exception of soil vitrification prior to landfill disposal.*

*Groundwater containment technologies involve the construction of a physical, chemical, or hydraulic barrier that isolates the impacted zone, either directing impacted water through a treatment zone or stopping its migration.*

## 18. AGRICULTURAL TREATMENT OPERATIONS / IN-SITU REMEDIAL OPERATION'S FACTS

According to Pacific Gas and Electric Company own admission, at PG&E's website link:

<http://www.pgecurrents.com/2011/03/30/pge-continues-work-to-cleanup-hinkley-starts-community-group/>

*Such operations are purported to "convert Chromium (V) to Chromium (III), by pumping ground drinking water contaminated with Chromium and irrigating the roots of alfalfa in alfalfa fields and such alfalfa roots, by microbial process, are purported to convert the Chromium (VI) to Chromium (III)", which assertions are also highly speculative. In September 2010, PG&E presented a feasibility study to the Water Board. Additional documents were submitted in January and March of 2011. The company's recommended alternative uses in-situ treatment in areas with higher concentrations, and agricultural treatment in areas with lower concentrations. PG&E estimates that it will take 40 years for the cleanup to achieve background levels of chromium. The in-situ process starts by injecting food-grade material, such as grain alcohol, into the groundwater to stimulate the growth of naturally occurring bacteria.*

*This bacteria turns hexavalent chromium into trivalent chromium, a naturally occurring substance. Once converted, the trivalent chromium leaves the groundwater and become part of the surrounding soil.*

*The agricultural treatment removes chromium by growing crops, such as alfalfa.*

*Water is pumped through a drip-irrigation system where the root zone of a crop creates conditions that turn hexavalent chromium into trivalent chromium, a naturally occurring substance.*

*Once converted, the trivalent chromium leaves the groundwater and become part of the surrounding soil.*

***(FACT is that such bacteria may convert Chromium III, but not convert Chromium (VI).***

### **FACTS ABOUT AGRICULTURAL TREATMENT OPERATIONS AND IN-SITU OPERATIONS CAUSING FURTHER CONTAMINATION OF AQUIFERS AND GROUND DRINKING WATER WITH OTHER TOXIC SUBSTANCES, INCLUDING ARSENIC AND URANIUM**

#### **Fact Sheet For Agricultural Treatment Operations and In-Situ Operations Causing Further Contamination of Aquifers and Ground Drinking Water With Other Toxic Substances, Including Arsenic and Uranium**

19. Based upon the facts described herein below, the *purported Agricultural Treatment Operations and In-Situ Operations has caused further poisoning of the Aquifers and Ground Drinking Water beneath the town Hinkley, CA 92347 with Arsenic and Uranium, in addition to with the historical, lasting sixty years to date, poisoning with Hexavalent Chromium, also known as Chromium (VI) and Cr6+, to wit:*

Per the State of California "CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD LAHONTAN REGION BOARD ORDER NO. R6V-2014-0023 WASTE DISCHARGE REQUIREMENTS FOR PACIFIC GAS AND ELECTRIC COMPANY GROUNDWATER REMEDIATION PROJECT AGRICULTURAL TREATMENT UNITS WDID NO. 6B361403002" link:

[http://www.waterboards.ca.gov/lahontan/water\\_issues/projects/pge/cao/docs/refs/31\\_r6v\\_2014\\_0023.pdf](http://www.waterboards.ca.gov/lahontan/water_issues/projects/pge/cao/docs/refs/31_r6v_2014_0023.pdf)

***"13. Constituents of Concern. The discharge of extracted groundwater to agricultural treatment units contains waste chromium originating from the compressor station. Extracted groundwater also contains total dissolved solids, nitrate, naturally-occurring uranium and other radionuclides, and naturally-occurring dissolved metals, such as arsenic, manganese, and iron."***

Per the State of California, Lahontan Regional Water Quality Control Board, as of April 2011, the Board was concerned that Pacific Gas and Electric Company's Agricultural and In-Situ Operations, consisting of ground water extraction for such operations, did contain dissolved Arsenic and in decay Uranium and radionuclides.



EXHIBIT "C"



### INTRODUCTION

1. Commencing July 1952, for over a decade and half, Pacific Gas and Electric Company (PG&E), discharged into large open unlined ponds, huge quantity of waste water from the cooling towers, containing the highly toxic and carcinogenic Hexavalent Chromium, with concentration over 5,000 ppb (parts per billion), located on owned property by PG&E, located in Hinkley, California 92347, the N.G. Compressor's Station.

2. To date, June 18, 2015, just about sixty three years later, despite claims by PG&E, that some of the Hexavalent Chromium was abated from the drinking water within the aquifers beneath certain portions of the town of Hinkley, CA 92347, the fact remains that the Hexavalent Chromium is not removed from the drinking water within all aquifers beneath the entire town of Hinkley, CA 9234. As a direct result thereof such poisoning, PG&E acquired hundreds of residences and immediately demolish them, further causing severe diminution in property value, virtually to zero dollar, public nuisance, and the town of Hinkley is now virtually resembling a ghost town, with worthless remaining real properties, and has further caused and is causing to most of the remaining few inhabitants in the town of Hinkley myriad of illnesses and diseases, including but not limited to premature and wrongful death, with majority of the residents, who did left Hinkley to other towns and states in United States, are now in fear of becoming very ill and prematurely dying.

3. Recently discovered by the remaining Victims in the town of Hinkley, CA, (remaining at no other alternative, stranded due to unable to dispose their real properties to no one), during the past nine months, was the fact that the drinking water within the aquifers beneath the entire town of Hinkley, California 92347, (the aquifer is the only source of drinking water since beginning of time for the town of Hinkley, aquifer construed as a public water), was also poisoned with the primary, highly toxic and carcinogenic byproduct's substances Arsenic and Uranium, resulted therefrom PG&E various operations, aimed to remove the Hexavalent Chromium from the drinking water within the aquifers beneath the town of Hinkley, CA 92347. Including but not limited to with other byproducts such as Manganese, now an aquifer so severely poisoned with the most highly toxic and carcinogenic substances, deemed in irreparable status. In fact, the entire town of Hinkley is a Superfund site.

FACTS ABOUT POISONED DRINKING WATER WITHIN AQUIFERS BENEATH THE TOWN OF HINKLEY, CA, PRESENTED BY THE VICTIMS FROM HINKLEY, CA 92347 (THE VICTIMS ARE THOSE PER ATTACHED HERETO "VICTIMS FROM HINKLEY, CA 92347" SIGNATURE'S PAGES)

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4. Regardless of the intensified complaints by the Victims, during the past nine months, virtually in Volumes, nothing has resulted in removing the Arsenic and Uranium from the drinking water within the aquifers, nor there was any action, in appropriate magnitude, by any Governmental agencies, charged with oversight and enforcement, specifically aimed at Pacific Gas and Electric Company (PG&E), to remove their byproducts Arsenic and Uranium therefrom the drinking water within the aquifers beneath the entire town of Hinkley, CA 92347. There are no other known polluters-contaminators-dischargers in the town of Hinkley, CA 92347, other than PG&E.

5. Despite the outcry by the Victims, many are just now diagnosed with terminal cancers and many have their skin within the body virtually falling off, with white spots, some bleeding, some dark as a tar, resulted therefrom utilizing the poisoned water for bathing, due to that there is no other water for such use, no governmental agencies charged with oversight and enforcement, has, or are whatsoever seeking appropriate actions against the only known polluter-contaminator-discharger PG&E. Such no-actions by the Regulatory Agencies is construed by the Victims as inhumane and are incomprehensible.

6. In light of what is transpiring, there is now more than obvious that PG&E was, and now is being vigorously shielded from investigation and prosecution, all to the extreme detriment to the Victims.

7. Furthermore, recent letter from Governmental agency, addressed to one of the Victims, stipulates that the People from Hinkley (the Victims) could be "adversary" to the Government. Since when the Government envisions that the Victims, the citizens of this free country, are an adversary to the Government. This is beyond any human dignity and comprehension.

8. No SLAPP actions, nor any other stipulations restricting the citizens inherent constitutional rights in this free country, particularly aimed at the Victims, will deter the Victims quest to have the truth, particularly the fact that the aquifers, as a public source for drinking water to which more than 25 connections are made, being the case for the entire town of Hinkley, CA 92347, is poisoned by PG&E with byproducts Arsenic and Uranium, particularly with the anthropogenic Arsenic, at concentration of 2,500 ppb. (Legal Limit is 10 ppb).



FACTS ABOUT POISONED DRINKING WATER WITHIN AQUIFERS BENEATH THE TOWN OF HINKLEY, CA, PRESENTED BY THE VICTIMS FROM HINKLEY, CA 92347 (THE VICTIMS ARE THOSE PER ATTACHED HERETO "VICTIMS FROM HINKLEY, CA 92347" SIGNATURE'S PAGES)

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9. Distinctively, it is incomprehensible the so called Study of Naturally Occurring Hexavalent Chromium, for which PG&E did cut a check to the Lahontan Regional Water Quality Control Board for Four Million Dollars, deposited in Board's account. The Victims has and are vigorously observing of what is Dr. Izbicky from USGS performing. Attempting to find the "illusionary" naturally occurring Hexavalent Chromium in Hinkley, CA 92347, thus reducing the strict legal liability for PG&E. In fact, the entire study is deemed by the Victims as incomprehensible, vague and ambiguous, further deemed as "junk science".

10. During all time, since August 2000, the Lahontan Regional Water Quality Control Board was strictly involved with the Hexavalent Chromium issue, and nothing meaningful was done to address the Arsenic-Uranium poisoning issue, triggering the Victims to believe that the drinking water within the aquifer beneath the entire town of Hinkley, CA 92347s was safe to drink and utilize for all other purposes.

11. Now, based upon intense investigation conducted by the Victims since September 2014, the circumstantial fact that the drinking water and all other potable waters within the aquifers beneath the entire town of Hinkley, CA 92347 was not safe to drink and use, since 2008.

12. The Victims has delivered, about ten days ago, 35 laboratory's containers with sampled water from the aquifers, within all locations the Victims real properties are situated to US EPA Criminal Investigation Division (CID) Los Angeles Resident Office, 600 Wilshire Boulevard Suite 900, Los Angeles, CA 90017. WECK Laboratory, City of Industry, CA has contacted the Victims, disclosing receipt from the US EPA CID.

13. The Victims has delivered on June 15, 2015, 35 laboratory containers with sampled water from the aquifers within all locations the Victims real properties are situated, to Western Environmental Laboratory, Las Vegas, NV and the Exhibits referencing the Laboratories are attached hereto this paper.

14. Upon received results from said laboratories of the tested drinking water exhibits of being poisoned with Arsenic at concentration greater than the maximum legal limit of 10 ppb (parts per billion), and Uranium at concentration greater than 20 pCi/L (picocurie per liter) or 30 ug/L (micrograms per liter), the Victims will press charges against Pacific Gas and Electric Company (PG&E) with all law enforcement agencies, charged with investigation and prosecution, and commence necessary actions to compel just and proper served to the Victims.

THE LEGAL ARENA

15. On, or about July 13, 2010, the issued water well permit to [REDACTED], CEO Ecosystem Solar Electric Corp., by the County of San Bernardino Department of Health, stipulated that the ground water beneath the [REDACTED] real property must not be used for the proposed solar thermal electric power plant.

16. Such stipulation, based upon further investigation, revealed that since the ground water contained Hexavalent Chromium, previously utilized as a corrosion inhibitor by PG&E, can be re-utilized by [REDACTED] solar-thermal electric power plant and by other solar-thermal electric power producers, located next to Harper Dry Lake, County of San Bernardino, and obviously since [REDACTED] plant was smaller than the other, the other plant can now re-utilize such water that contains the corrosion inhibitor for their cooling towers. (PG&E is the purchaser of the power generated from said other solar-thermal electric power generating plant).

17. Such event triggered total economic loss to all investments made by [REDACTED] and caused [REDACTED] to take the appropriate actions, by launching massive investigation until June 8, 2015, of poisoned inhabitants within the town of Hinkley, CA 92347, with Hexavalent Chromium and recently, since September 10, 2014, poisoned with Arsenic and Uranium Victims.

18. On or about May 2013, [REDACTED] had at hand over 300 Victims and located the law firm Callahan & Blaine, who in turn, filed on June 2013 Class Action lawsuit against Pacific Gas and Electric Company (PG&E), Case No. CIVDS1308429.

19. Something unorthodox has happened with that Class Action, triggering 52 Victims to voluntary and temporarily withdraw themselves as Class Members, and to further file own lawsuits against Pacific Gas and Electric Company, a California corporation, on or about September 2014. (In all, 35 cases filed in the Superior Court County of San Bernardino).

20. Due to fact that the statute of limitations has long ago run out on the Hexavalent Chromium poisoning, and the fact that [REDACTED] has discovered that the aquifers beneath the Victims real properties were poisoned with Arsenic and/or Uranium (the new discovery within any statute of limitations), has now triggered the assignees of the Victims, to initiate actions seeking either new Class Action, or to litigate all individually.

### CONCLUSION

21. In the Legal Arena, in the Governmental Administrative Arena, in fact, in any arena, the issue of these controversy can only escalate to unprecedented proportion, if just and proper is not served to the all Victims, now approaching over one hundred.

22. The legal arena situated in the State of California is now approaching the status of being out of jurisdiction, due to pending Complete Diversity Jurisdiction.

23. The Governmental Administrative Arena, within the State of California, is now approaching to be substituted with the Federal Administrative Arena, due to not only exhausted administrative remedy by the Victims in the State of California, but on the ground of the "Federal Question", violation of the United States Safe Drinking Water Act (SDWA), with US EPA at the helm, due to inaction by the Cal EPA, Et Al State of California Regulatory Agencies, charged with oversight, investigation, enforcement and timely prosecution of the polluter-contaminator-discharger Pacific gas and Electric Company (PG&E), with the highly toxic and carcinogenic substances Arsenic and Uranium, in addition to the historic discharge of Hexavalent Chromium.

24. The attached hereto Volume of Exhibits, mostly evidentiary, disclosing the true facts, are in support thereof the Victims' presentation, which should be taken more than seriously by all, per the attached hereto Mailing List, in light of the upcoming massive investigation, that can result implications beyond borders.

25. Citing the voluntarily dismissed without prejudice, prior to trial and prior to hearings, of the 35 cases filed by the initial Victims against Pacific Gas and Electric Company, a California corporation, on one, of the several, grounds, in addition to the Complete Diversity Jurisdiction question :

"Justice is not served when, by a hypertechnical objection to a pleading or by a trivial imperfection in the choice of words, a litigant is deprived of his rights to have case submitted to the decision of a jury....." *Thomas v. Seaside Memorial Hospital* (1947) 80 Cal.App.2nd 841,851. "It is, of course, the policy of the law that legal controversy be disposed of on their merits and not upon technical ground of pleadings". *Metzger v. Bose* (1957) 155 Cal.App.2nd 131, 133.

During the investigation, and pendency of all actions, the Victims will be forwarding additional documentation.



EXHIBIT "D"





STATE WATER RESOURCES CONTROL BOARD  
REGIONAL WATER QUALITY CONTROL BOARDS

CALIFORNIA STATE



ENVIRONMENTAL LABORATORY ACCREDITATION PROGRAM

**CERTIFICATE OF ENVIRONMENTAL LABORATORY ACCREDITATION**

Is hereby granted to

**Western Environmental Testing Laboratory**

475 East Greg Street, # 119

Sparks, NV 89431

Scope of the certificate is limited to the  
"Fields of Testing"  
which accompany this Certificate.

Continued accredited status depends on successful completion of on-site,  
proficiency testing studies, and payment of applicable fees.

This Certificate is granted in accordance with provisions of  
Section 100825, et seq. of the Health and Safety Code.

Certificate No.: 2523

Expiration Date: 11/30/2016

Effective Date: 12/1/2014

Richmond, California  
subject to forfeiture or revocation

Christine Sotelo, Chief  
Environmental Laboratory Accreditation Program



CALIFORNIA STATE

ENVIRONMENTAL LABORATORY ACCREDITATION PROGRAM BRANCH

**CERTIFICATE OF ENVIRONMENTAL LABORATORY ACCREDITATION**

is hereby granted to

**Weck Laboratories, Inc.**

**Weck Analytical Environmental Services**

14859 East Clark Avenue

City of Industry, CA 91745

Scope of the certificate is limited to the  
Fields of Testing  
which accompany this Certificate

Conditional accredited status depends on successful completion of on-site  
proficiency testing studies and payment of applicable fees.

This Certificate is granted in accordance with provisions of  
Section 100925, et seq. of the Health and Safety Code.

Certificate No. 1132

Expiration Date 03/31/2016

Effective Date 04/01/2014

100 Woodland Avenue  
Suite 100, Fullerton, California

  
David Mazzoni, Ph.D., Assistant Director, Chief  
Department of Drinking Water and Environmental Management





CALIFORNIA STATE

ENVIRONMENTAL LABORATORY ACCREDITATION PROGRAM BRANCH

**CERTIFICATE OF ENVIRONMENTAL LABORATORY ACCREDITATION**

Is hereby granted to

**Clinical Laboratory of San Bernardino, Inc.**

21881 Barton Road  
Grand Terrace, CA 92313

Scope of the certificate is limited to the  
"Fields of Testing"  
which accompany this Certificate.

Continued accredited status depends on successful completion of on-site,  
proficiency testing studies, and payment of applicable fees.

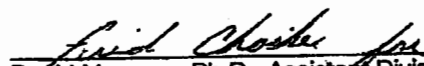
This Certificate is granted in accordance with provisions of  
Section 100825, et seq. of the Health and Safety Code.

Certificate No.: 1088

Expiration Date: 01/31/2016

Effective Date: 02/01/2014

Richmond, California  
subject to forfeiture or revocation

  
David Mazzera, Ph.D., Assistant Division Chief  
Division of Drinking Water and Environmental Management



WECK LABORATORIES, INC.

Analytical Laboratory Service - Since 1964

## Certificate of Analysis

Report Date: 09/23/14 15:37

Received Date: 09/04/14 12:07

Client: Water Investigations  
848 N. Rainbow Blvd., #122  
Las Vegas, NV 89107

Turnaround Time: Normal

Phone: (702) 301-4167

Fax:

P.O.#:

Attn: [REDACTED]

Project:

Dear [REDACTED]:

Enclosed are the results of analyses for samples received 9/4/2014 with the Chain of Custody document. The samples were received in good condition, at 2.9 °C. All analysis met the method criteria except as noted below or in the report with data qualifiers.

Work Order No: 4104036-01  
Sampled by: [REDACTED]

Sample ID: #1 (Chromium6)  
Sampled: 09/03/14 17:50

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Chromium 6+	2.2		ug/l	0.30	1	EPA 218.6	09/10/14 10:50	09/10/14 13:36	cwh	W410499

Work Order No: 4104036-02  
Sampled by: [REDACTED]

Sample ID: #2 (Chromium6)  
Sampled: 09/03/14 16:50

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Chromium 6+	0.49		ug/l	0.30	1	EPA 218.6	09/10/14 10:50	09/10/14 13:36	cwh	W410499

Work Order No: 4104036-03  
Sampled by: [REDACTED]

Sample ID: #3 (Chromium6)  
Sampled: 09/03/14 18:20

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Chromium 6+	ND		ug/l	0.30	1	EPA 218.6	09/10/14 10:50	09/10/14 13:36	cwh	W410499

Work Order No: 4104036-04  
Sampled by: [REDACTED]

Sample ID: #39 (Chromium6)  
Sampled: 09/03/14 15:55

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Chromium 6+	ND		ug/l	0.30	1	EPA 218.6	09/10/14 10:50	09/10/14 13:36	cwh	W410499

Work Order No: 4104036-05  
Sampled by: [REDACTED]

Sample ID: #1 Arsenic(Arsenic)  
Sampled: 09/03/14 18:10

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	2500		ug/l	0.80	1	EPA 200.8	09/15/14 08:51	09/15/14 19:18	ml	W410722

Work Order No: 4104036-06  
Sampled by: [REDACTED]

Sample ID: #2 Arsenic(Arsenic)  
Sampled: 09/03/14 17:15

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	34		ug/l	0.40	1	EPA 200.8	09/15/14 08:51	09/15/14 19:22	ml	W410722

Work Order No: 4104036-07  
Sampled by: [REDACTED]

Sample ID: #12 (Uranium)  
Sampled: 09/03/14 09:30

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium Rad	10		pCi/L	0.13	1	EPA 200.8	09/15/14 08:51	09/15/14 19:31	ml	W41203

Lab#: 4104036-08

Page 1 of 2

Exhibit A<sup>n</sup>

# Western Environmental Testing Laboratory

## QC Report

QCBatchID	QCType	Parameter	Method	Result	Units							
QC15010189	Blank 1	Arsenic	EPA 200.8	0.0015	mg/L							
QCBatchID	QCType	Parameter	Method	Result	Actual	% Recovery	Units					
QC15010189	LCS 1	Arsenic	EPA 200.8	0.0528	0.050	106	mg/L					
QCBatchID	QCType	Parameter	Method	Spike Sample	Sample Result	MS Result	MSD Result	Spike Value	Units	MS % Rec.	MSD % Rec.	RPD
QC15010189	MS 1	Arsenic	EPA 200.8	1412779-001	ND	0.0536	0.0536	0.050	mg/L	103	103	<1%

Customer Sample ID: [REDACTED]

Collect Date/Time: 12/16/2014 16:00

WETLAB Sample ID: 1412761-002

Receive Date: 12/23/2014 13:10

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	24	µg/L	1	1.0	1/6/2015	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		1/6/2015	NV00925

Customer Sample ID: DO-Y.K

Collect Date/Time: 12/16/2014 14:00

WETLAB Sample ID: 1412761-003

Receive Date: 12/23/2014 13:10

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	740	µg/L	1	1.0	1/6/2015	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		1/6/2015	NV00925

Customer Sample ID: DW-22-53

Collect Date/Time: 12/16/2014 08:45

WETLAB Sample ID: 1412761-004

Receive Date: 12/23/2014 13:10

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	37	µg/L	1	1.0	1/6/2015	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		1/6/2015	NV00925

DF=Dilution Factor, RL=Reporting Limit, ND=Not Detected or &lt;RL

**SPARKS**

475 E. Greg Street, Suite 119  
 Sparks, Nevada 89431  
 tel (775) 355-0202  
 fax (775) 355-0817  
 EPA LAB ID: NV00925 - ELAP No: 2523

**ELKO**

1004 Lamoille Hwy  
 Elko, Nevada 89801  
 tel (775) 777-9933  
 fax (775) 777-9933  
 EPA LAB ID: NV00926

**LAS VEGAS**

3230 Potosi Ave. Suite 4  
 Las Vegas, Nevada 89102  
 tel (702) 475-8889  
 fax (702) 622-2888  
 EPA LAB ID: NV00932

EXHIBIT A

# Clinical Laboratory of San Bernardino, Inc.



██████████ ██████████ Barstow CA, 92311	Project: Routine Sub Project: Toxic Tort Towns / Hinkley Project Manager: ██████████	Work Order: 14H0183 Received: 08/04/14 17:05 Reported: 08/19/14
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**TOLEDO** 14H0183-08 (Water) Sample Date: 07/26/14 15:30 Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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Metals

Arsenic (As) SM3113-B 19 ug/L 2.0 10 08/11/14 08/11/14 1433025

**SARAY ORDAZ** 14H0183-09 (Water) Sample Date: 07/30/14 18:05 Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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Metals

Arsenic (As) SM3113-B 270 ug/L 20 10 08/15/14 08/18/14 1433586

**HOLCROFT** 14H0183-10 (Water) Sample Date: 07/30/14 14:00 Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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Metals

Arsenic (As) SM3113-B 350 ug/L 20 10 08/15/14 08/18/14 1433586

**JENKINS** 14H0183-11 (Water) Sample Date: 07/30/14 14:30 Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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Metals

Arsenic (As) SM3113-B ND ug/L 2.0 10 08/11/14 08/11/14 1433025

**BAIN** 14H0183-12 (Water) Sample Date: 07/30/14 16:30 Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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Metals

Arsenic (As) SM3113-B 140 ug/L 20 10 08/15/14 08/18/14 1433586

**LUCILLE RIDDLE COM** 14H0183-13 (Water) Sample Date: 07/31/14 10:00 Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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Metals

Arsenic (As) SM3113-B 66 ug/L 4.0 10 08/15/14 08/18/14 1433586

**MILLER** 14H0183-14 (Water) Sample Date: 07/31/14 10:30 Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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Metals

Arsenic (As) SM3113-B 470 ug/L 20 10 08/15/14 08/18/14 1433586

Exhibit "A"

EXHIBIT  
47/L-8  
44/L-3  
427/L-89

# Clinical Laboratory of San Bernardino, Inc.



Barstow CA, 92311

Project: Routine  
Sub Project: Toxic Tort Towns / Hinkley  
Project Manager: [REDACTED]

Work Order: 14H0183  
Received: 08/04/14 17:05  
Reported: 08/19/14

## TOLEDO

14H0183-08 (Water)

Sample Date: 07/26/14 15:30

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B 19 ug/L 2.0 10 08/11/14 08/11/14 1433025

## SARAY ORDAZ

14H0183-09 (Water)

Sample Date: 07/30/14 18:05

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B 270 ug/L 20 10 08/15/14 08/18/14 1433586

## HOLCROFF

14H0183-10 (Water)

Sample Date: 07/30/14 14:00

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B 350 ug/L 20 10 08/15/14 08/18/14 1433586

## JENKINS

14H0183-11 (Water)

Sample Date: 07/30/14 14:30

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B ND ug/L 2.0 10 08/11/14 08/11/14 1433025

## BAIN

14H0183-12 (Water)

Sample Date: 07/30/14 16:30

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B 140 ug/L 20 10 08/15/14 08/18/14 1433586

## LUCILLE RIDDLE COM

14H0183-13 (Water)

Sample Date: 07/31/14 10:00

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
---------	--------	--------	-------	------------	-----	----------	----------	-------	-----------

### Metals

Arsenic (As) SM3113-B 66 ug/L 4.0 10 08/15/14 08/18/14 1433586

## MILLER

14H0183-14 (Water)

Sample Date: 07/31/14 10:30

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B 470 ug/L 20 10 08/15/14 08/18/14 1433586

EXHIBIT  
KM  
6-7/L-8  
6-4/L-3  
6-27/L-8  
Exhibit "A"

# Western Environmental Testing Laboratory

## QC Report

CBatchID	QCType	Parameter	Method	Result	Units							
C15010189	Blank 1	Arsenic	EPA 200.8	0.0015	mg/L							
CBatchID	QCType	Parameter	Method	Result	Actual	% Recovery	Units					
C15010189	LCS 1	Arsenic	EPA 200.8	0.0528	0.050	106	mg/L					
CBatchID	QCType	Parameter	Method	Spike Sample	Sample Result	MS Result	MSD Result	Spike Value	Units	MS % Rec.	MSD % Rec.	RPD
C15010189	MS 1	Arsenic	EPA 200.8	1412779-001	ND	0.0536	0.0536	0.050	mg/L	103	103	<1%

Customer Sample ID: [REDACTED]

Collect Date/Time: 12/16/2014 16:00

WETLAB Sample ID: 1412761-002

Receive Date: 12/23/2014 13:10

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	24	µg/L	1	1.0	1/6/2015	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		1/6/2015	NV00925

Customer Sample ID: DO-Y.K

Collect Date/Time: 12/16/2014 14:00

WETLAB Sample ID: 1412761-003

Receive Date: 12/23/2014 13:10

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	740	µg/L	1	1.0	1/6/2015	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		1/6/2015	NV00925

Customer Sample ID: DW-22-53

Collect Date/Time: 12/16/2014 08:45

WETLAB Sample ID: 1412761-004

Receive Date: 12/23/2014 13:10

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	37	µg/L	1	1.0	1/6/2015	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		1/6/2015	NV00925

DF=Dilution Factor, RL=Reporting Limit, ND=Not Detected or &lt;RL

EXHIBIT A<sup>11</sup>X<sup>7</sup>

**SPARKS**  
 475 E. Greg Street, Suite 118  
 Sparks, Nevada 89431  
 tel (775) 355-0202  
 fax (775) 355-0817  
 EPA LAB ID: NV00925 - ELAP No: 2523

**ELKO**  
 1064 Lamoille Hwy  
 Elko, Nevada 89601  
 tel (775) 777-9933  
 fax (775) 777-9933  
 EPA LAB ID: NV00926

**LAS VEGAS**  
 3230 Poteris Ave. Suite 4  
 Las Vegas, Nevada 89162  
 tel (702) 475-8899  
 fax (702) 622-2868  
 EPA LAB ID: NV00932



WECK LABORATORIES, INC.

Analytical Laboratory Service - Since 1964

## Certificate of Analysis

Report Date: 09/09/14 08:37

Received Date: 08/28/14 13:32

Client: Water Investigations  
848 N. Rainbow Blvd., #122  
Las Vegas, NV 89107

Turnaround Time: Normal

Phone: (702) 301-4167

Fax:

P.O.#:

Attn: [REDACTED]

Project:

Dear [REDACTED]:

Enclosed are the results of analyses for samples received 8/28/2014 with the Chain of Custody document. The samples were received in good condition, at 4.9 °C. All analysis met the method criteria except as noted below or in the report with data qualifiers.

Work Order No: 4H28040-01  
Sampled by: [REDACTED]

Sample ID: Chromium (VI) #7  
Sampled: 08/27/14 16:20

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Chromium 6+	1.9		ug/l	0.30	1	EPA 218.6	09/03/14 10:00	09/03/14 15:37	cwh	W410098

Work Order No: 4H28040-02  
Sampled by: [REDACTED]

Sample ID: Uranium #7  
Sampled: 08/27/14 11:10

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	8.5		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:40	ml	W410209

Work Order No: 4H28040-03  
Sampled by: [REDACTED]

Sample ID: Uranium #19  
Sampled: 08/27/14 11:30

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	49		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:42	ml	W410209

Work Order No: 4H28040-04  
Sampled by: [REDACTED]

Sample ID: Uranium #38  
Sampled: 08/27/14 11:50

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	17		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:45	ml	W410209

Work Order No: 4H28040-05  
Sampled by: [REDACTED]

Sample ID: Uranium #39  
Sampled: 08/27/14 12:15

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	16		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:47	ml	W410209

Work Order No: 4H28040-06  
Sampled by: [REDACTED]

Sample ID: Uranium #28  
Sampled: 08/27/14 12:35

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	19		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:59	ml	W410209

Work Order No: 4H28040-07  
Sampled by: [REDACTED]

Sample ID: Uranium #21  
Sampled: 08/27/14 13:00

Matrix: Water  
Sample Note:

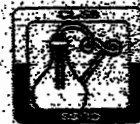
Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	30		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 15:14	ml	W410209

Lab#: 4H28040-09

Page 1 of 2

Exhibit A

# Clinical Laboratory of San Bernardino, Inc.



██████████  
25633 Anderson Ave  
Barstow CA, 92311

Project: Routine  
Sub Project: Toxic Tort Towns / Hinkley  
Project Manager: ██████████

Work Order: 14H0183  
Received: 08/04/14 17:05  
Reported: 08/19/14

## TOLEDO

14H0183-08 (Water)

Sample Date: 07/26/14 15:30

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B 19 ug/L 2.0 10 08/11/14 08/11/14 1433025

## SARAY ORDAZ

14H0183-09 (Water)

Sample Date: 07/30/14 18:05

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B 270 ug/L 20 10 08/15/14 08/18/14 1433586

## HOLCROFF

14H0183-10 (Water)

Sample Date: 07/30/14 14:00

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B 350 ug/L 20 10 08/15/14 08/18/14 1433586

## JENKINS

14H0183-11 (Water)

Sample Date: 07/30/14 14:30

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B ND ug/L 2.0 10 08/11/14 08/11/14 1433025

## BAIN

14H0183-12 (Water)

Sample Date: 07/30/14 16:30

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B 140 ug/L 20 10 08/15/14 08/18/14 1433586

## LUCILLE RIDDLE COM

14H0183-13 (Water)

Sample Date: 07/31/14 10:00

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B 66 ug/L 4.0 10 08/15/14 08/18/14 1433586

## MILLER

14H0183-14 (Water)

Sample Date: 07/31/14 10:30

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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### Metals

Arsenic (As) SM3113-B 470 ug/L 20 10 08/15/14 08/18/14 1433586

Exhibit "A"

EXHIBIT  
6-7/2-8  
4-4/2-3  
4-27/2-89





## Certificate of Analysis

Report Date: 10/20/14 14:06  
Received Date: 10/07/14 12:50Client: Water Investigations  
848 N. Rainbow Blvd., #122  
Las Vegas, NV 89107

Turnaround Time: 6 workdays

Phone: (702) 301-4167

Attn: [REDACTED]

Fax:

Project: Arsenic Testing

E.O.#: [REDACTED]

Dear [REDACTED]:

Enclosed are the results of analyses for samples received 10/7/2014 with the Chain of Custody document. The samples were received in good condition, at 1.3 °C and on ice. All analysis met the method criteria except as noted below or in the report with data qualifiers.

Work Order No: 4J07046-01  
Sampled by: Jack RosenSample ID: #16 Brown  
Sampled: 10/04/14 10:00Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	120		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:03	ml	W4J0456

Work Order No: 4J07046-02  
Sampled by: [REDACTED]Sample ID: Ken Nitao  
Sampled: 10/04/14 11:30Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	76		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:08	ml	W4J0456

Work Order No: 4J07046-03  
Sampled by: [REDACTED]Sample ID: #39 Jenkins  
Sampled: 10/04/14 13:00Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	3.9		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:12	ml	W4J0456

Work Order No: 4J07046-04  
Sampled by: [REDACTED]Sample ID: #13 Corby  
Sampled: 10/04/14 13:30Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	4.8		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:29	ml	W4J0456

Work Order No: 4J07046-05  
Sampled by: [REDACTED]Sample ID: #28 Charles Matthiesen  
Sampled: 10/04/14 14:30Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	210		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:34	ml	W4J0456

Work Order No: 4J07046-06  
Sampled by: [REDACTED]Sample ID: #37 Ramirez  
Sampled: 10/04/14 14:45Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	11		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:38	ml	W4J0456

Work Order No: 4J07046-07  
Sampled by: [REDACTED]Sample ID: #51 Robeling  
Sampled: 10/04/14 16:30Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	38		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:55	ml	W4J0456

Exhibit 'A'



WECK LABORATORIES, INC.

Analytical Laboratory Service - Since 1964

## Certificate of Analysis

Report Date: 09/09/14 08:37  
Received Date: 08/28/14 13:32Client: Water Investigations  
848 N. Rainbow Blvd., #122  
Las Vegas, NV 89107

Turnaround Time: Normal

Phone: (702) 301-4167

Attn: [REDACTED]

Fax: [REDACTED]

Project:

P.O.#:

Dear [REDACTED]:

Enclosed are the results of analyses for samples received 8/28/2014 with the Chain of Custody document. The samples were received in good condition, at 4.9 °C. All analysis met the method criteria except as noted below or in the report with data qualifiers.

Work Order No: 4H28040-01  
Sampled by: [REDACTED]Sample ID: Chromium (VI) #7  
Sampled: 08/27/14 16:20Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Chromium 6+	1.9		ug/l	0.30	1	EPA 218.6	09/03/14 10:00	09/03/14 15:37	cwh	W410098

Work Order No: 4H28040-02  
Sampled by: [REDACTED]Sample ID: Uranium #7  
Sampled: 08/27/14 11:10Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	8.5		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:40	ml	W410209

Work Order No: 4H28040-03  
Sampled by: [REDACTED]Sample ID: Uranium #19  
Sampled: 08/27/14 11:30Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	49		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:42	ml	W410209

Work Order No: 4H28040-04  
Sampled by: [REDACTED]Sample ID: Uranium #39  
Sampled: 08/27/14 11:50Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	17		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:45	ml	W410209

Work Order No: 4H28040-05  
Sampled by: [REDACTED]Sample ID: Uranium #39  
Sampled: 08/27/14 12:15Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	16		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:47	ml	W410209

Work Order No: 4H28040-06  
Sampled by: [REDACTED]Sample ID: Uranium #28  
Sampled: 08/27/14 12:35Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	19		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:59	ml	W410209

Work Order No: 4H28040-07  
Sampled by: [REDACTED]Sample ID: Uranium #21  
Sampled: 08/27/14 13:00Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	30		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 15:14	ml	W410209

Lab#: 4H28040-09

Page 1 of 2

Exhibit A

# Clinical Laboratory of San Bernardino, Inc.



Callahan & Blaine  
3 Hutton Centre Drive, Ninth Floor  
Santa Ana CA, 92707

Project: Drinking Water  
Sub Project: Irving  
Project Manager: Javier H. van Oordt

Work Order: 13H1419  
Received: 08/16/13 11:55  
Reported: 09/03/13

Irving

13H1419-01 (Water)

Sample Date: 08/16/13 8:00 Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MDL	MCL	Prepared	Analyzed	Batch	Qualifier
<b>Metals</b>										
Arsenic (As)	SM3113-B	30	ug/L	2.0	0.68	10	08/22/13	08/22/13	1334349	
Chromium (+6)	EPA 218.6	1.3	ug/L	1.0	0.14		08/16/13	08/19/13	1334014	
<b>Radiochemistry Analyses</b>										
Gross Beta	EPA 900.0	15	pCi/L	4.0		50	08/19/13	08/26/13	1330379	
Gross Beta Counting Error	EPA 900.0	3.2	pCi/L				08/19/13	08/26/13	1330379	
Gross Beta Min Det Activity	EPA 900.0	2.2	pCi/L				08/19/13	08/26/13	1330379	
Uranium	EPA 908.0	70	pCi/L	1.0		20	08/20/13	08/20/13	1333313	
Uranium Counting Error	EPA 908.0	3.5	pCi/L				08/20/13	08/20/13	1333313	
Uranium Min Det Activity	EPA 908.0	0.88	pCi/L				08/20/13	08/20/13	1333313	

J Detected below the Reporting Limit; reported concentration is estimated; (J-Flag)

ND Analyte NOT DETECTED at or above the MDL; Method Detection Limit

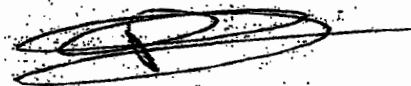
  
Robin Glenney  
Project Manager

EXHIBIT "A-E"

Page 1 of 1

# Clinical Laboratory of San Bernardino, Inc.



[Redacted] Barstow CA, 92311	Project: Routine Sub Project: Hinkley Project Manager: [Redacted]	Work Order: 14H0251 Received: 08/06/14 08:20 Reported: 08/28/14
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Robert Richards      14H0251-01 (Water)      Sample Date: 08/05/14 11:08      Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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## Metals

Arsenic (As)	SM3113-B	73	ug/L	4.0	10	08/20/14	08/20/14	1434256	
Chromium (+6)	EPA 218.6	ND	ug/L	1.0	10	08/06/14	08/07/14	1432413	

Paul Morehouse      14H0251-02 (Water)      Sample Date: 08/05/14 12:11      Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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## Metals

Arsenic (As)	SM3113-B	19	ug/L	2.0	10	08/11/14	08/11/14	1433025	
Chromium (+6)	EPA 218.6	ND	ug/L	1.0	10	08/06/14	08/07/14	1432413	

Contreras      14H0251-03 (Water)      Sample Date: 08/05/14 12:55      Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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## Metals

Arsenic (As)	SM3113-B	748	ug/L	50	10	08/20/14	08/20/14	1434256	
Chromium (+6)	EPA 218.6	ND	ug/L	1.0	10	08/06/14	08/07/14	1432413	

Barbara Allen      14H0251-04 (Water)      Sample Date: 08/05/14 13:43      Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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## Metals

Arsenic (As)	SM3113-B	ND	ug/L	2.0	10	08/11/14	08/11/14	1433025	
Chromium (+6)	EPA 218.6	ND	ug/L	1.0	10	08/06/14	08/07/14	1432413	

ND      Analyte NOT DETECTED at or above the reporting limit

  
 Robin Glenney  
 Project Manager

Exhibit "A"

# Clinical Laboratory of San Bernardino, Inc.



[Redacted] Barstow CA, 92311	Project: Routine Sub Project: Hinkley	Work Order: 14H0251 Received: 08/06/14 08:20 Reported: 08/28/14
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[Redacted]	14H0251-01 (Water)	Sample Date: 08/05/14 11:08	Sampler: Nick Panchev
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Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
<b>Metals</b>									
Arsenic (As)	SM3113-B	73	ug/L	4.0	10	08/20/14	08/20/14	1434256	
Chromium (+6)	EPA 218.6	ND	ug/L	1.0	10	08/06/14	08/07/14	1432413	

Paul Morehouse	14H0251-02 (Water)	Sample Date: 08/05/14 12:11	Sampler: Nick Panchev
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Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
<b>Metals</b>									
Arsenic (As)	SM3113-B	19	ug/L	2.0	10	08/11/14	08/11/14	1433025	
Chromium (+6)	EPA 218.6	ND	ug/L	1.0	10	08/06/14	08/07/14	1432413	

[Redacted]	14H0251-03 (Water)	Sample Date: 08/05/14 12:55	Sampler: Nick Panchev
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Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
<b>Metals</b>									
Arsenic (As)	SM3113-B	740	ug/L	50	10	08/20/14	08/20/14	1434256	
Chromium (+6)	EPA 218.6	ND	ug/L	1.0	10	08/06/14	08/07/14	1432413	

Barbara Allen	14H0251-04 (Water)	Sample Date: 08/05/14 13:43	Sampler: Nick Panchev
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Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
<b>Metals</b>									
Arsenic (As)	SM3113-B	ND	ug/L	2.0	10	08/11/14	08/11/14	1433025	
Chromium (+6)	EPA 218.6	ND	ug/L	1.0	10	08/06/14	08/07/14	1432413	

ND Analyte NOT DETECTED at or above the reporting limit

  
 Robin Glenney  
 Project Manager

Exhibit "A"

# Clinical Laboratory of San Bernardino, Inc.



Callahan & Blaine  
3 Hutton Centre Drive, Ninth Floor  
Santa Ana CA, 92707

Project: Drinking Water  
Sub Project: Irving  
Project Manager: [REDACTED]

Work Order: 13H1419  
Received: 08/16/13 11:55  
Reported: 09/03/13

Irving

13H1419-01 (Water)

Sample Date: 08/16/13 8:00 Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MDL	MCL	Prepared	Analyzed	[REDACTED]
<b>Metals</b>									
Arsenic (As)	SM3113-B	30	ug/L	2.0	0.68	10	08/22/13	08/22/13	1334349
Chromium (+6)	EPA 218.6	1.3	ug/L	1.0	0.14		08/16/13	08/19/13	1334014
<b>Radiochemistry Analyses</b>									
Gross Beta	EPA 900.0	15	pCi/L	4.0		50	08/19/13	08/26/13	1330379
Gross Beta Counting Error	EPA 900.0	3.2	pCi/L				08/19/13	08/26/13	1330379
Gross Beta Min Det Activity	EPA 900.0	2.2	pCi/L				08/19/13	08/26/13	1330379
Uranium	EPA 908.0	70	pCi/L	1.0		20	08/20/13	08/20/13	1333313
Uranium Counting Error	EPA 908.0	3.5	pCi/L				08/20/13	08/20/13	1333313
Uranium Min Det Activity	EPA 908.0	0.88	pCi/L				08/20/13	08/20/13	1333313

J Detected below the Reporting Limit; reported concentration is estimated; (J-Flag)

ND Analyte NOT DETECTED at or above the MDL; Method Detection Limit

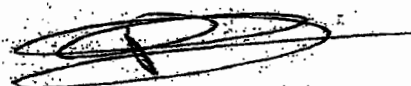
  
Robin Glenney  
Project Manager

EXHIBIT "A-E"

Page 1 of 1



WECK LABORATORIES, INC.

Analytical Laboratory Service - Since 1964

## Certificate of Analysis

Report Date: 09/09/14 08:37

Received Date: 08/28/14 13:32

Client: Water Investigations  
848 N. Rainbow Blvd., #122  
Las Vegas, NV 89107

Turnaround Time: Normal

Phone: (702) 301-4167

Fax: (702) 301-4167

P.O.#:

Attn: [REDACTED]

Project:

Dear [REDACTED]:

Enclosed are the results of analyses for samples received 8/28/2014 with the Chain of Custody document. The samples were received in good condition, at 4.9 °C. All analysis met the method criteria except as noted below or in the report with data qualifiers.

Work Order No: 4H28040-01  
Sampled by: [REDACTED]

Sample ID: Chromium (VI) #7  
Sampled: 08/27/14 16:20

Matrix: Water  
Sample Note: [REDACTED]

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Chromium 6+	1.9		ug/l	0.30	1	EPA 218.6	09/03/14 10:00	09/03/14 15:37	cwh	W410098

Work Order No: 4H28040-02  
Sampled by: [REDACTED]

Sample ID: Uranium #7  
Sampled: 08/27/14 11:10

Matrix: Water  
Sample Note: [REDACTED]

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	8.5		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:40	ml	W410209

Work Order No: 4H28040-03  
Sampled by: [REDACTED]

Sample ID: Uranium #19  
Sampled: 08/27/14 11:30

Matrix: Water  
Sample Note: [REDACTED]

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	49		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:42	ml	W410209

Work Order No: 4H28040-04  
Sampled by: [REDACTED]

Sample ID: Uranium #38  
Sampled: 08/27/14 11:50

Matrix: Water  
Sample Note: [REDACTED]

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	17		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:45	ml	W410209

Work Order No: 4H28040-05  
Sampled by: [REDACTED]

Sample ID: Uranium #39  
Sampled: 08/27/14 12:15

Matrix: Water  
Sample Note: [REDACTED]

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	16		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:47	ml	W410209

Work Order No: 4H28040-06  
Sampled by: [REDACTED]

Sample ID: Uranium #28  
Sampled: 08/27/14 12:35

Matrix: Water  
Sample Note: [REDACTED]

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	19		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:59	ml	W410209

Work Order No: 4H28040-07  
Sampled by: [REDACTED]

Sample ID: Uranium #21  
Sampled: 08/27/14 13:00

Matrix: Water  
Sample Note: [REDACTED]

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	30		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 15:14	ml	W410209

Lab#: 4H28040-09

Page 1 of 2

Exhibit A



## Certificate of Analysis

Report Date: 10/20/14 14:06  
Received Date: 10/07/14 12:50Client: Water Investigations  
848 N. Rainbow Blvd., #122  
Las Vegas, NV 89107

Turnaround Time: 6 workdays

Phone: (702) 301-4167

Attn: [REDACTED]

Fax:

R.O.#: [REDACTED]

Project: Arsenic Testing

Dear [REDACTED]:

Enclosed are the results of analyses for samples received 10/7/2014 with the Chain of Custody document. The samples were received in good condition, at 1.3 °C and on ice. All analysis met the method criteria except as noted below or in the report with data qualifiers.

Work Order No: 4J07046-01  
Sampled by: Jack RosenSample ID: [REDACTED]  
Sampled: 10/04/14 10:00Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	120		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:03	ml	W4J0456

Work Order No: 4J07046-02  
Sampled by: [REDACTED]Sample ID: [REDACTED]  
Sampled: 10/04/14 11:30Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	76		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:08	ml	W4J0456

Work Order No: 4J07046-03  
Sampled by: [REDACTED]Sample ID: [REDACTED]  
Sampled: 10/04/14 12:00Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	3.9		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:12	ml	W4J0456

Work Order No: 4J07046-04  
Sampled by: [REDACTED]Sample ID: [REDACTED]  
Sampled: 10/04/14 13:30Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	4.8		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:29	ml	W4J0456

Work Order No: 4J07046-05  
Sampled by: [REDACTED]Sample ID: [REDACTED]  
Sampled: 10/04/14 14:00Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	210		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:34	ml	W4J0456

Work Order No: 4J07046-06  
Sampled by: [REDACTED]Sample ID: [REDACTED]  
Sampled: 10/04/14 14:45Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	11		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:38	ml	W4J0456

Work Order No: 4J07046-07  
Sampled by: [REDACTED]Sample ID: [REDACTED]  
Sampled: 10/04/14 16:30Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	38		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:55	ml	W4J0456

Exhibit 'A'



# Clinical Laboratory of San Bernardino, Inc.



25633 Anderson Ave  
Barstow CA, 92311

Project: Routine  
Sub Project: Toxic Tort Towns / Hinkley  
Project Manager: [REDACTED]

Work Order: 14H0183  
Received: 08/04/14 17:05  
Reported: 08/19/14

14H0183-08 (Water)

Sample Date: 07/26/14 15:30

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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## Metals

Arsenic (As)	SM3113-B	19	ug/L	2.0	10	08/11/14	08/11/14	1433025	
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14H0183-09 (Water)

Sample Date: 07/30/14 18:05

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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## Metals

Arsenic (As)	SM3113-B	270	ug/L	20	10	08/15/14	08/18/14	1433586	
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14H0183-10 (Water)

Sample Date: 07/30/14 14:00

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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## Metals

Arsenic (As)	SM3113-B	350	ug/L	20	10	08/15/14	08/18/14	1433586	
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14H0183-11 (Water)

Sample Date: 07/30/14 14:30

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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## Metals

Arsenic (As)	SM3113-B	ND	ug/L	2.0	10	08/11/14	08/11/14	1433025	
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## BAIN

14H0183-12 (Water)

Sample Date: 07/30/14 16:30

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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## Metals

Arsenic (As)	SM3113-B	140	ug/L	20	10	08/15/14	08/18/14	1433586	
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14H0183-13 (Water)

Sample Date: 07/31/14 10:00

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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## Metals

Arsenic (As)	SM3113-B	66	ug/L	4.0	10	08/15/14	08/18/14	1433586	
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14H0183-14 (Water)

Sample Date: 07/31/14 10:30

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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## Metals

Arsenic (As)	SM3113-B	470	ug/L	20	10	08/15/14	08/18/14	1433586	
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Exhibit "A"

EXHIBIT  
6-7/2-8  
6-4/2-3  
6-27/2-89



WECK LABORATORIES, INC.

Analytical Laboratory Service - Since 1964

## Certificate of Analysis

Report Date: 09/09/14 08:37

Received Date: 08/28/14 13:32

Client: Water Investigations  
848 N. Rainbow Blvd., #122  
Las Vegas, NV 89107

Turnaround Time: Normal

Phone: (702) 300-1077

Fax:

P.O.#:

Attn:

Project:

Dear:

Enclosed are the results of analyses for samples received 8/28/2014 with the Chain of Custody document. The samples were received in good condition, at 4.9 °C. All analysis met the method criteria except as noted below or in the report with data qualifiers.

Work Order No: 4H28040-01  
Sampled by:

Sample ID: Chromium (VI) #7  
Sampled: 08/27/14 16:20

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Chromium 6+	1.9		ug/l	0.30	1	EPA 218.6	09/03/14 10:00	09/03/14 15:37	ml	W410209

Work Order No: 4H28040-02  
Sampled by:

Sample ID: Uranium #7  
Sampled: 08/27/14 11:10

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	8.5		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:40	ml	W410209

Work Order No: 4H28040-03  
Sampled by:

Sample ID: Uranium #19  
Sampled: 08/27/14 11:30

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	49		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:42	ml	W410209

Work Order No: 4H28040-04  
Sampled by:

Sample ID: Uranium #38  
Sampled: 08/27/14 11:50

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	17		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:45	ml	W410209

Work Order No: 4H28040-05  
Sampled by:

Sample ID: Uranium #39  
Sampled: 08/27/14 12:15

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	16		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:47	ml	W410209

Work Order No: 4H28040-06  
Sampled by:

Sample ID: Uranium #28  
Sampled: 08/27/14 12:35

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	19		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:59	ml	W410209

Work Order No: 4H28040-07  
Sampled by:

Sample ID: Uranium #21  
Sampled: 08/27/14 13:00

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	30		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 15:14	ml	W410209

Lab#: 4H28040-09

Page 1 of 2

14859 East Clark Avenue, City of Industry, California 91745-1396 (626) 336-2139 FAX (626) 336-2634  
www.wecklabs.com

Exhibit A

# Western Environmental Testing Laboratory

## QC Report

CBatchID	QCType	Parameter	Method	Result	Units							
C15010189	Blank 1	Arsenic	EPA 200.8	0.0015	mg/L							
CBatchID	QCType	Parameter	Method	Result	Actual	% Recovery	Units					
C15010189	LCS 1	Arsenic	EPA 200.8	0.0528	0.050	106	mg/L					
CBatchID	QCType	Parameter	Method	Spike Sample	Sample Result	MS Result	MSD Result	Spike Value	Units	MS % Rec.	MSD % Rec.	RPD
C15010189	MS 1	Arsenic	EPA 200.8	1412779-001	ND	0.0536	0.0536	0.050	mg/L	103	103	<1%

Customer Sample ID: [REDACTED]

Collect Date/Time: 12/16/2014 16:00

WETLAB Sample ID: 1412761-002

Receive Date: 12/23/2014 13:10

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<b>Trace Metals by ICP-MS</b>							
Arsenic	EPA 200.8	24	µg/L	1	1.0	1/6/2015	NV00925
<b>Sample Preparation</b>							
Trace Metals Digestion	EPA 200.2	Complete		1		1/6/2015	[REDACTED]

Customer Sample ID: DO-Y.K

Collect Date/Time: 12/16/2014 14:00

WETLAB Sample ID: 1412761-003

Receive Date: 12/23/2014 13:10

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<b>Trace Metals by ICP-MS</b>							
Arsenic	EPA 200.8	740	µg/L	1	1.0	1/6/2015	NV00925
<b>Sample Preparation</b>							
Trace Metals Digestion	EPA 200.2	Complete		1		1/6/2015	NV00925

Customer Sample ID: DW-22-53

Collect Date/Time: 12/16/2014 08:45

WETLAB Sample ID: 1412761-004

Receive Date: 12/23/2014 13:10

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<b>Trace Metals by ICP-MS</b>							
Arsenic	EPA 200.8	37	µg/L	1	1.0	1/6/2015	NV00925
<b>Sample Preparation</b>							
Trace Metals Digestion	EPA 200.2	Complete		1		1/6/2015	NV00925

DF=Dilution Factor, RL=Reporting Limit, ND=Not Detected or &lt;RL

**SPARKS**

475 E. Greg Street, Suite 119  
 Sparks, Nevada 89431  
 tel (775) 355-0202  
 fax (775) 355-0817  
 EPA LAB ID: NV00925 - ELAP No: 2523

**ELKO**

1084 Lamotte Hwy  
 Elko, Nevada 89601  
 tel (775) 777-9933  
 fax (775) 777-9933  
 EPA LAB ID: NV00926

**LAS VEGAS**

3230 Poteris Ave. Suite 4  
 Las Vegas, Nevada 89162  
 tel (702) 475-8899  
 fax (702) 622-2868  
 EPA LAB ID: NV00922

EXHIBIT A<sup>11</sup> X<sup>2</sup>

# Clinical Laboratory of San Bernardino, Inc.



[Redacted] [Redacted] Barstow CA, 92311	Project: Routine Sub Project: Toxic Tort Towns / Hinkley Project Manager: [Redacted]	Work Order: 14H0183 Received: 08/04/14 17:05 Reported: 08/19/14
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14H0183-08 (Water)				Sample Date: 07/26/14 15:30		Sampler: Nick Panchev			
Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier

Metals

Arsenic (As)	SM3113-B	19	ug/L	2.0	10	08/11/14	08/11/14	1433025
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14H0183-09 (Water)				Sample Date: 07/30/14 18:05		Sampler: Nick Panchev			
Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier

Metals

Arsenic (As)	SM3113-B	270	ug/L	20	10	08/15/14	08/18/14	1433586
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14H0183-10 (Water)				Sample Date: 07/30/14 14:00		Sampler: Nick Panchev			
Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier

Metals

Arsenic (As)	SM3113-B	350	ug/L	20	10	08/15/14	08/18/14	1433586
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14H0183-11 (Water)				Sample Date: 07/30/14 14:30		Sampler: Nick Panchev			
Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier

Metals

Arsenic (As)	SM3113-B	ND	ug/L	2.0	10	08/11/14	08/11/14	1433025
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14H0183-12 (Water)				Sample Date: 07/30/14 16:30		Sampler: Nick Panchev			
Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier

Metals

Arsenic (As)	SM3113-B	140	ug/L	20	10	08/15/14	08/18/14	1433586
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14H0183-13 (Water)				Sample Date: 07/31/14 10:00		Sampler: Nick Panchev			
Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier

Metals

Arsenic (As)	SM3113-B	66	ug/L	4.0	10	08/15/14	08/18/14	1433586
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14H0183-14 (Water)				Sample Date: 07/31/14 10:30		Sampler: Nick Panchev			
Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier

Metals

Arsenic (As)	SM3113-B	470	ug/L	20	10	08/15/14	08/18/14	1433586
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EXHIBIT  
 KM  
 2-7/L-8  
 2-4/L-3  
 2-27/L-8  
 Exhibit "A"

# Clinical Laboratory of San Bernardino, Inc.



[Redacted] [Redacted] Barstow CA, 92311	Project: Routine Sub Project: Toxic Tort Towns / Hinkley Project Manager: [Redacted]	Work Order: 14H0183 Received: 08/04/14 17:05 Reported: 08/19/14
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[Redacted]	14H0183-08 (Water)	Sample Date: 07/26/14 15:30	Sampler: Nick Panchev
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Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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**Metals**

Arsenic (As)	SM3113-B	19	ug/L	2.0	10	08/11/14	08/11/14	1433025
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[Redacted]	14H0183-09 (Water)	Sample Date: 07/30/14 18:05	Sampler: Nick Panchev
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Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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**Metals**

Arsenic (As)	SM3113-B	270	ug/L	20	10	08/15/14	08/18/14	1433586
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[Redacted]	14H0183-10 (Water)	Sample Date: 07/30/14 14:00	Sampler: Nick Panchev
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Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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**Metals**

Arsenic (As)	SM3113-B	350	ug/L	20	10	08/15/14	08/18/14	1433586
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[Redacted]	14H0183-11 (Water)	Sample Date: 07/30/14 14:30	Sampler: Nick Panchev
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Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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**Metals**

Arsenic (As)	SM3113-B	ND	ug/L	2.0	10	08/11/14	08/11/14	1433025
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[Redacted]	14H0183-12 (Water)	Sample Date: 07/30/14 16:30	Sampler: Nick Panchev
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Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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**Metals**

Arsenic (As)	SM3113-B	140	ug/L	20	10	08/15/14	08/18/14	1433586
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[Redacted]	14H0183-13 (Water)	Sample Date: 07/31/14 10:00	Sampler: Nick Panchev
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Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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**Metals**

Arsenic (As)	SM3113-B	66	ug/L	4.0	10	08/15/14	08/18/14	1433586
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[Redacted]	14H0183-14 (Water)	Sample Date: 07/31/14 10:30	Sampler: Nick Panchev
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Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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**Metals**

Arsenic (As)	SM3113-B	470	ug/L	20	10	08/15/14	08/18/14	1433586
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Exhibit "A"

EXHIBIT  
 6-7/L-8  
 6-4/L-3  
 6-27/L-89

# Western Environmental Testing Laboratory

## QC Report

QCBatchID	QCType	Parameter	Method	Result	Units							
QC15010189	Blank 1	Arsenic	EPA 200.8	0.0015	mg/L							
QCBatchID	QCType	Parameter	Method	Result	Actual	% Recovery	Units					
QC15010189	LCS 1	Arsenic	EPA 200.8	0.0528	0.050	106	mg/L					
QCBatchID	QCType	Parameter	Method	Spike Sample	Sample Result	MS Result	MSD Result	Spike Value	Units	MS % Rec.	MSD % Rec.	RPD
QC15010189	MS 1	Arsenic	EPA 200.8	1412779-001	ND	0.0536	0.0536	0.050	mg/L	103	103	<1%

Customer Sample ID: [REDACTED]

Collect Date/Time: 12/16/2014 16:00

WETLAB Sample ID: 1412761-002

Receive Date: 12/23/2014 13:10

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	24	µg/L	1	1.0	1/6/2015	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		1/6/2015	NV00925

Customer Sample ID: DO-Y.K.

Collect Date/Time: 12/16/2014 14:00

WETLAB Sample ID: 1412761-003

Receive Date: 12/23/2014 13:10

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	740	µg/L	1	1.0	1/6/2015	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		1/6/2015	NV00925

Customer Sample ID: DW-22-53

Collect Date/Time: 12/16/2014 08:45

WETLAB Sample ID: 1412761-004

Receive Date: 12/23/2014 13:10

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	37	µg/L	1	1.0	1/6/2015	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		1/6/2015	NV00925

DF=Dilution Factor, RL=Reporting Limit, ND=Not Detected or &lt;RL

**SPARKS**

475 E. Gang Street, Suite 119  
 Sparks, Nevada 89431  
 tel (775) 355-0262  
 fax (775) 355-0817  
 EPA LAB ID: NV00925 - ELAP No: 2523

**ELKO**

1084 Lamoille Hwy  
 Elko, Nevada 89801  
 tel (775) 777-9933  
 fax (775) 777-9933  
 EPA LAB ID: NV00926

**LAS VEGAS**

3230 Potrero Ave. Suite 4  
 Las Vegas, Nevada 89102  
 tel (702) 475-8699  
 fax (702) 622-2868  
 EPA LAB ID: NV00932

EXHIBIT A-6

# Clinical Laboratory of San Bernardino, Inc.



[Redacted] Barstow CA, 92311	Project: Routine Sub Project: Toxic Tort Towns / Hinkley Project Manager: [Redacted]	Work Order: 14H0183 Received: 08/04/14 17:05 Reported: 08/19/14
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[Redacted]	14H0183-08 (Water)	Sample Date: 07/26/14 15:30	Sampler: Nick Panchev
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Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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## Metals

Arsenic (As)	SM3113-B	19	ug/L	2.0	10	08/11/14	08/11/14	1433025
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[Redacted]	14H0183-09 (Water)	Sample Date: 07/30/14 18:05	Sampler: Nick Panchev
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Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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## Metals

Arsenic (As)	SM3113-B	270	ug/L	20	10	08/15/14	08/18/14	1433586
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[Redacted]	14H0183-10 (Water)	Sample Date: 07/30/14 14:00	Sampler: Nick Panchev
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Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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## Metals

Arsenic (As)	SM3113-B	350	ug/L	20	10	08/15/14	08/18/14	1433586
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[Redacted]	14H0183-11 (Water)	Sample Date: 07/30/14 14:30	Sampler: Nick Panchev
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Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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## Metals

Arsenic (As)	SM3113-B	ND	ug/L	2.0	10	08/11/14	08/11/14	1433025
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[Redacted]	14H0183-12 (Water)	Sample Date: 07/30/14 16:30	Sampler: Nick Panchev
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Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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## Metals

Arsenic (As)	SM3113-B	140	ug/L	20	10	08/15/14	08/18/14	1433586
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[Redacted]	14H0183-13 (Water)	Sample Date: 07/31/14 10:00	Sampler: Nick Panchev
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Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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## Metals

Arsenic (As)	SM3113-B	66	ug/L	4.0	10	08/15/14	08/18/14	1433586
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[Redacted]	14H0183-14 (Water)	Sample Date: 07/31/14 10:30	Sampler: Nick Panchev
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Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
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## Metals

Arsenic (As)	SM3113-B	470	ug/L	20	10	08/15/14	08/18/14	1433586
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Exhibit "A"

EXHIBIT  
 6-7/2-8  
 2-4/2-35  
 6-27/2-89

# Western Environmental Testing Laboratory Analytical Report

Contaminated Realty  
848 N. Rainbow Blvd. #1422  
Las Vegas, NV 89107

Attn: [REDACTED]

Phone: [REDACTED] Fax: [REDACTED]

PO/Project: 31411074/TOSIC TORT TOWNS

Date Printed: 12/5/2014

OrderID: 1411453

Customer Sample ID: HAWES #11

Collect Date/Time: 11/13/2014 13:05

WETLAB Sample ID: 1411453-001

Receive Date: 11/17/2014 15:00

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	57	µg/L	1	1.0	12/1/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		12/1/2014	NV00925

Customer Sample ID: CHARLES MATTHIESEN #28

Collect Date/Time: 11/13/2014 13:30

WETLAB Sample ID: 1411453-002

Receive Date: 11/17/2014 15:00

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	46	µg/L	1	1.0	12/1/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		12/1/2014	NV00925

Customer Sample ID: CORBY #13

Collect Date/Time: 11/13/2014 14:00

WETLAB Sample ID: 1411453-003

Receive Date: 11/17/2014 15:00

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	9.8	µg/L	1	1.0	12/1/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		12/1/2014	NV00925

Customer Sample ID: HAUSTEAD #26

Collect Date/Time: 11/13/2014 15:00

WETLAB Sample ID: 1411453-004

Receive Date: 11/17/2014 15:00

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	19	µg/L	1	1.0	12/1/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		12/1/2014	NV00925

DF=Dilution Factor, RL=Reporting Limit, ND=Not Detected or <RL

Page 3 of 5

**SPARKS**  
475 E. Craig Street, Suite 110  
Sparks, Nevada 89431  
tel (775) 685-0882  
fax (775) 685-0817  
EPA LAB ID: NV00925 - ELAP No: 0523

**ELKO**  
1004 Laramie Hwy.  
Elko, Nevada 89601  
tel (775) 777-0833  
fax (775) 777-0838  
EPA LAB ID: NV00925

**LAS VEGAS**  
3280 Potosi Ave. Suite 4  
Las Vegas, Nevada 89102  
tel (702) 475-6888  
fax (702) 622-2888  
EPA LAB ID: NV00925

Exhibit "A"





## Certificate of Analysis

Report Date: 10/31/14 12:34

Received Date: 10/14/14 12:15

Client: Water Investigations  
848 N. Rainbow Blvd., #122  
Las Vegas, NV 89107

Turnaround Time: Normal

Phone: (702) 301-4167

Fax:

P.O.#:

Attn: [REDACTED]

Project: Drinking water

Dear [REDACTED]:

Enclosed are the results of analyses for samples received 10/14/2014 with the Chain of Custody document. The samples were received in good condition, at 1.0 °C and on ice. All analysis met the method criteria except as noted below or in the report with data qualifiers.

Work Order No: 4J14041-01  
Sampled by: [REDACTED]

Sample ID: #61 Velasquez  
Sampled: 10/13/14 09:30

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	54		ug/l	0.40	1	EPA 200.8	10/23/14 11:46	10/24/14 16:01	ml	W4J1182

Work Order No: 4J14041-02  
Sampled by: [REDACTED]

Sample ID: #62 [REDACTED]  
Sampled: 10/13/14 10:00

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	150		ug/l	0.40	1	EPA 200.8	10/23/14 11:46	10/24/14 16:05	ml	W4J1182

Work Order No: 4J14041-03  
Sampled by: [REDACTED]

Sample ID: #29 David [REDACTED]  
Sampled: 10/13/14 11:00

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	20		ug/l	0.40	1	EPA 200.8	10/23/14 11:46	10/24/14 16:09	ml	W4J1182

Work Order No: 4J14041-04  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/13/14 11:30

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	79		ug/l	0.40	1	EPA 200.8	10/23/14 11:46	10/24/14 16:14	ml	W4J1182

Work Order No: 4J14041-05  
Sampled by: Client

Sample ID: [REDACTED]  
Sampled: 10/13/14 12:10

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	5.5		ug/l	0.40	1	EPA 200.8	10/23/14 11:46	10/24/14 16:16	ml	W4J1182

Work Order No: 4J14041-06  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/13/14 12:50

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium Rad	12		pCi/L	0.13	1	EPA 200.8	10/23/14 11:51	10/24/14 17:23	ml	W4J1183

Work Order No: 4J14041-07  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/13/14 16:00

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium 6+	ND		ug/l	0.30	1	EPA 218.6	10/16/14 09:50	10/16/14 19:38	hmt	W4J0792

Case Narrative:

Lab#: 4J14041-07

Page 1 of 2

Exhibit "A"



WECK LABORATORIES, INC.

Analytical Laboratory Service - Since 1964

## Certificate of Analysis

Report Date: 09/09/14 08:37

Received Date: 08/28/14 13:32

Client: Water Investigations  
848 N. Rainbow Blvd., #122  
Las Vegas, NV 89107

Turnaround Time: Normal

Phone: (702) 301-4167

Fax: (702) 301-4167

P.O.#:

Attn: [REDACTED]

Project:

Dear [REDACTED]:

Enclosed are the results of analyses for samples received 8/28/2014 with the Chain of Custody document. The samples were received in good condition, at 4.9 °C. All analysis met the method criteria except as noted below or in the report with data qualifiers.

Work Order No: 4H28040-01  
Sampled by: Jack Rosen

Sample ID: Chromium (VI) #7  
Sampled: 08/27/14 16:20

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Chromium 6+	1.9		ug/l	0.30	1	EPA 218.6	09/03/14 10:00	09/03/14 15:37	cwh	W410098

Work Order No: 4H28040-02  
Sampled by: [REDACTED]

Sample ID: Uranium #7  
Sampled: 08/27/14 11:10

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	8.5		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:40	ml	W410209

Work Order No: 4H28040-03  
Sampled by: [REDACTED]

Sample ID: Uranium #19  
Sampled: 08/27/14 11:30

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	49		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:42	ml	W410209

Work Order No: 4H28040-04  
Sampled by: [REDACTED]

Sample ID: Uranium #38  
Sampled: 08/27/14 11:50

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	17		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:45	ml	W410209

Work Order No: 4H28040-05  
Sampled by: [REDACTED]

Sample ID: Uranium #39  
Sampled: 08/27/14 12:15

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	16		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:47	ml	W410209

Work Order No: 4H28040-06  
Sampled by: [REDACTED]

Sample ID: Uranium #28  
Sampled: 08/27/14 12:35

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	19		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:59	ml	W410209

Work Order No: 4H28040-07  
Sampled by: [REDACTED]

Sample ID: Uranium #21  
Sampled: 08/27/14 13:00

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	30		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 15:14	ml	W410209

Lab#: 4H28040-09

Page 1 of 2

EXHIBIT "A"



## Certificate of Analysis

Report Date: 10/31/14 12:34

Received Date: 10/14/14 12:15

Client: Water Investigations  
848 N. Rainbow Blvd., #122  
Las Vegas, NV 89107

Turnaround Time: Normal

Phone: (702) 301-4167

Fax:

P.O.#:

Attn: [REDACTED]

Project: Drinking water

Dear [REDACTED]:

Enclosed are the results of analyses for samples received 10/14/2014 with the Chain of Custody document. The samples were received in good condition, at 1.0 °C and on ice. All analysis met the method criteria except as noted below or in the report with data qualifiers.

Work Order No: 4J14041-01  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/13/14 11:30

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	54		ug/l	0.40	1	EPA 200.8	10/23/14 11:46	10/24/14 16:01	ml	W4J1182

Work Order No: 4J14041-02  
Sampled by: [REDACTED]

Sample ID: #58 Matsue  
Sampled: 10/13/14 10:00

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	150		ug/l	0.40	1	EPA 200.8	10/23/14 11:46	10/24/14 16:05	ml	W4J1182

Work Order No: 4J14041-03  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/13/14 11:00

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	20		ug/l	0.40	1	EPA 200.8	10/23/14 11:46	10/24/14 16:09	ml	W4J1182

Work Order No: 4J14041-04  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/13/14 11:30

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	79		ug/l	0.40	1	EPA 200.8	10/23/14 11:46	10/24/14 16:14	ml	W4J1182

Work Order No: 4J14041-05  
Sampled by: Client

Sample ID: [REDACTED]  
Sampled: 10/13/14 12:10

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	5.5		ug/l	0.40	1	EPA 200.8	10/23/14 11:46	10/24/14 16:18	ml	W4J1182

Work Order No: 4J14041-06  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/13/14 12:50

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium Rad.	12		pCi/L	0.13	1	EPA 200.8	10/23/14 11:51	10/24/14 17:23	ml	W4J1183

Work Order No: 4J14041-07  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/13/14 16:00

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Chromium 6+	ND		ug/l	0.30	1	EPA 218.6	10/16/14 09:50	10/16/14 19:38	hmt	W4J0792

Case Narrative:

Lab#: 4J14041-07

Page 1 of 2

Exhibit "A"



## Certificate of Analysis

Work Order No: 4J07046-08  
Sampled by: Jack RosenSample ID: #57 Ornelas  
Sampled: 10/04/14 12:10Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	140		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 16:00	ml	W4J0456

## Case Narrative:

Authorized Signature

Contact: Kim G Tu  
(Project Manager)ELAP # 1132  
LACSD # 10143  
NELAC # 04229CA

The results in this report apply to the samples analyzed in accordance with the chain of custody document. Weck Laboratories certifies that the test results meet all requirements of NELAC unless noted in the Case Narrative. This analytical report must be reproduced in its entirety.

Notes:  
The Chain of Custody document is part of the analytical report.  
Any remaining sample(s) for testing will be disposed of one month from the final report date unless other arrangements are made in advance.  
All results are expressed on wet weight basis unless otherwise specified.

NOT DETECTED at or above the Reporting Limit. If J-value reported, then NOT DETECTED at or above the Method Detection Limit (MDL)  
= Not Reportable  
Sub = Subcontracted analysis, original report enclosed.

An Absence of Total Coliform meets the drinking water standards as established by the State of California Department of Health Services.  
The Reporting Limit (RL) is referenced as laboratory's Practical Quantitation Limit (PQL).  
For Potable water analysis, the Reporting Limit (RL) is referenced as Detection Limit for reporting purposes (DLRs) defined by EPA.

If sample collected by Weck Laboratories, sampled in accordance to lab SOP MIS002

Exhibit "A"



## Certificate of Analysis

Report Date: 10/20/14 14:06  
Received Date: 10/07/14 12:50Client: Water Investigations  
848 N. Rainbow Blvd., #122  
Las Vegas, NV 89107

Turnaround Time: 6 workdays

Phone: (702) 303-1167

Fax:

P.O.#:

Attn: [REDACTED]

Project: Arsenic Testing

Dear [REDACTED]:

Enclosed are the results of analyses for samples received 10/7/2014 with the Chain of Custody document. The samples were received in good condition, at 1.3 °C and on ice. All analysis met the method criteria except as noted below or in the report with data qualifiers.

Work Order No: 4J07046-01  
Sampled by: [REDACTED]Sample ID: [REDACTED]  
Sampled: 10/04/14 10:00Matrix: Water  
Sample Note:

CONTINUE - see Page 2

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	120		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:03	ml	W4J0456

Work Order No: 4J07046-02  
Sampled by: [REDACTED]Sample ID: [REDACTED]  
Sampled: 10/04/14 11:30Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	76		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:08	ml	W4J0456

Work Order No: 4J07046-03  
Sampled by: [REDACTED]Sample ID: [REDACTED]  
Sampled: 10/04/14 13:00Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	3.9		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:12	ml	W4J0456

Work Order No: 4J07046-04  
Sampled by: [REDACTED]Sample ID: [REDACTED]  
Sampled: 10/04/14 13:30Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	4.8		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:29	ml	W4J0456

Work Order No: 4J07046-05  
Sampled by: [REDACTED]Sample ID: [REDACTED]  
Sampled: 10/04/14 14:00Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	210		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:34	ml	W4J0456

Work Order No: 4J07046-06  
Sampled by: [REDACTED]Sample ID: [REDACTED]  
Sampled: 10/04/14 14:45Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	11		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:38	ml	W4J0456

Work Order No: 4J07046-07  
Sampled by: [REDACTED]Sample ID: [REDACTED]  
Sampled: 10/04/14 16:30Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	38		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:55	ml	W4J0456

Exhibit "A"

# Western Environmental Testing Laboratory Analytical Report

Contaminated Realty  
848 N. Rainbow Blvd. #1422  
Las Vegas, NV 89107  
Attn: [REDACTED]

Phone: (702) 301-4167 Fax:

PO\Project: 31411074/TOSIC TORT TOWNS

Date Printed: 12/5/2014

OrderID: 1411453

Customer Sample ID: HAWES #11

Collect Date/Time: 11/13/2014 13:06

WETLAB Sample ID: 1411453-001

Receive Date: 11/17/2014 15:00

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	57	µg/L	1	1.0	12/1/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete				12/1/2014	NV00925

Customer Sample ID: CHARLES MATTHIESEN #28

Collect Date/Time: 11/13/2014 13:30

WETLAB Sample ID: 1411453-002

Receive Date: 11/17/2014 15:00

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	46	µg/L	1	1.0	12/1/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete				12/1/2014	NV00925

Customer Sample ID: CORBY #13

Collect Date/Time: 11/13/2014 14:00

WETLAB Sample ID: 1411453-003

Receive Date: 11/17/2014 15:00

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	9.8	µg/L	1	1.0	12/1/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete				12/1/2014	NV00925

Customer Sample ID: HAUSTEAD #26

Collect Date/Time: 11/13/2014 15:00

WETLAB Sample ID: 1411453-004

Receive Date: 11/17/2014 15:00

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	19	µg/L	1	1.0	12/1/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		12/1/2014	NV00925

DF=Dilution Factor, RL=Reporting Limit, ND=Not Detected or <RL

Page 3 of 5

## SPARKS

475 E. Craig Street, Suite 119  
Sparks, Nevada 89431  
tel (775) 685-0282  
fax (775) 685-0517  
EPA LAB ID: NV00925 - ELAP No: 8523

## ELKO

1084 Lemello Hwy.  
Elko, Nevada 89601  
tel (775) 772-0535  
fax (775) 772-0539  
EPA LAB ID: NV00925

## LAS VEGAS

3230 Polaris Ave. Suite 4  
Las Vegas, Nevada 89102  
tel (702) 475-0080  
fax (702) 822-2888  
EPA LAB ID: NV00925

Exhibit A

# Western Environmental Testing Laboratory Analytical Report

Contaminated Realty  
848 N. Rainbow Blvd. #1422  
Las Vegas, NV 89107

Attn: [REDACTED]

Phone: (702) 301-4167 Fax:

PO\Project: 31411074/TOSIC TORT TOWNS

Date Printed: 12/5/2014

OrderID: 1411453

Customer Sample ID: [REDACTED]  
WETLAB Sample ID: 1411453-001

Collect Date/Time: 11/13/2014 13:05

Receive Date: 11/17/2014 15:00

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	57	µg/L	1	1.0	12/1/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		12/1/2014	NV00925

Customer Sample ID: [REDACTED]  
WETLAB Sample ID: 1411453-002

Collect Date/Time: 11/13/2014 13:30

Receive Date: 11/17/2014 15:00

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	46	µg/L	1	1.0	12/1/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		12/1/2014	NV00925

Customer Sample ID: [REDACTED]  
WETLAB Sample ID: 1411453-003

Collect Date/Time: 11/13/2014 14:00

Receive Date: 11/17/2014 15:00

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	9.8	µg/L	1	1.0	12/1/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		12/1/2014	NV00925

Customer Sample ID: [REDACTED]  
WETLAB Sample ID: 1411453-004

Collect Date/Time: 11/13/2014 15:00

Receive Date: 11/17/2014 15:00

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	19	µg/L	1	1.0	12/1/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		12/1/2014	NV00925

DF=Dilution Factor, RL=Reporting Limit, ND=Not Detected or <RL

Page 3 of 5

**SPARKS**  
475 E. Greg Street, Suite 118  
Sparks, Nevada 89431  
tel (775) 485-0882  
fax (775) 485-0877  
EPA LAB ID: NV00925 - ELAP No: 2523

**ELKO**  
1084 Lamoille Hwy.  
Elko, Nevada 89601  
tel (775) 777-0933  
fax (775) 777-0933  
EPA LAB ID: NV00925

**LAS VEGAS**  
3250 Potters Ave. Suite 4  
Las Vegas, Nevada 89102  
tel (702) 475-0888  
fax (702) 622-2888  
EPA LAB ID: NV00925

Exhibit "A"



## Certificate of Analysis

Report Date: 09/09/14 08:37

Received Date: 08/28/14 13:32

Client: Water Investigations  
848 N. Rainbow Blvd., #122  
Las Vegas, NV 89107

Turnaround Time: Normal

Phone: (702) 301-4167

Fax:

P.O.#:

Attn: [REDACTED]

Project:

Dear [REDACTED]:

Enclosed are the results of analyses for samples received 8/28/2014 with the Chain of Custody document. The samples were received in good condition, at 4.9 °C. All analysis met the method criteria except as noted below or in the report with data qualifiers.

Work Order No: 4H28040-01  
Sampled by: Jack Rosen

Sample ID: Chromium (VI) #7  
Sampled: 08/27/14 16:20

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Chromium 6+	1.9		ug/l	0.30	1	EPA 212.6	08/05/14 10:00	09/08/14 15:37	cwh	W410098

Work Order No: 4H28040-02  
Sampled by: [REDACTED]

Sample ID: Uranium #7  
Sampled: 08/27/14 11:10

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	8.5		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:40	ml	W410209

Work Order No: 4H28040-03  
Sampled by: [REDACTED]

Sample ID: Uranium #19  
Sampled: 08/27/14 11:30

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	49		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:42	ml	W410209

Work Order No: 4H28040-04  
Sampled by: [REDACTED]

Sample ID: Uranium #38  
Sampled: 08/27/14 11:50

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	17		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:45	ml	W410209

Work Order No: 4H28040-05  
Sampled by: [REDACTED]

Sample ID: Uranium #39  
Sampled: 08/27/14 12:15

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	16		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:47	ml	W410209

Work Order No: 4H28040-06  
Sampled by: [REDACTED]

Sample ID: Uranium #28  
Sampled: 08/27/14 12:35

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	19		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:59	ml	W410209

Work Order No: 4H28040-07  
Sampled by: [REDACTED]

Sample ID: Uranium #21  
Sampled: 08/27/14 13:00

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	30		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 15:14	ml	W410209

Exhibit "A"



## Western Environmental Testing Laboratory QC Report

QCBatchID	QCType	Parameter	Method	Result	Units							
QC14121247	Blank 1	Arsenic	EPA 200.8	ND	µg/L							
QC14121249	Blank 1	Arsenic	EPA 200.8	ND	µg/L							
QC14121250	Blank 1	Arsenic	EPA 200.8	ND	µg/L							
QCBatchID	QCType	Parameter	Method	Result	Actual	% Recovery	Units					
QC14121247	LCS 1	Arsenic	EPA 200.8	50.6	50.0	101	µg/L					
QC14121249	LCS 1	Arsenic	EPA 200.8	50.6	50.0	101	µg/L					
QC14121250	LCS 1	Arsenic	EPA 200.8	49.0	50.0	98	µg/L					
QCBatchID	QCType	Parameter	Method	Spike Sample	Sample Result	MS Result	MSD Result	Spike Value	Units	MS % Rec.	MSD % Rec.	RPD
QC14121247	MS 1	Arsenic	EPA 200.8	1412321-001	44.0	92.8	89.9	50.0	µg/L	98	92	3%
QC14121249	MS 1	Arsenic	EPA 200.8	1412321-011	20.7	69.3	66.5	50.0	µg/L	97	92	4%
QC14121250	MS 1	Arsenic	EPA 200.8	1412321-021	30.2	M 61.4	63.8	50.0	µg/L	NC	NC	NC

Customer Sample ID: [REDACTED]  
WETLAB Sample ID: 1412321-023

Collect Date/Time: 12/7/2014 13:00  
Receive Date: 12/9/2014 13:30

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<b>Trace Metals by ICP-MS</b>							
Arsenic	EPA 200.8	620	µg/L	10	10	12/23/2014	NV00925
<b>Sample Preparation</b>							
Trace Metals Digestion	EPA 200.2	Complete		1		12/18/2014	NV00925

Customer Sample ID: [REDACTED]  
WETLAB Sample ID: 1412321-024

Collect Date/Time: 12/7/2014 14:00  
Receive Date: 12/9/2014 13:30

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<b>Trace Metals by ICP-MS</b>							
Arsenic	EPA 200.8	13	µg/L	1	1.0	12/23/2014	NV00925
<b>Sample Preparation</b>							
Trace Metals Digestion	EPA 200.2	Complete		1		12/18/2014	NV00925

DF=Dilution Factor, RL=Reporting Limit, ND=Not Detected or <RL

**SPARKS**  
475 E. Greg Street, Suite 119  
Sparks, Nevada 89431  
tel (775) 355-0202  
fax (775) 355-0017  
EPA LAB ID: NV00925 - ELAP No: 2526

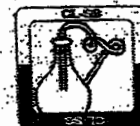
**ELKO**  
1084 Lamoille Hwy  
Elko, Nevada 89801  
tel (775) 777-9933  
fax (775) 777-9933  
EPA LAB ID: NV00926

**LAS VEGAS**  
3230 Polaris Ave. Suite 4  
Las Vegas, Nevada 89102  
tel (702) 475-8899  
fax (702) 622-2868  
EPA LAB ID: NV00932

~~EXHIBIT "L-62"~~  
~~EXHIBIT "L-88"~~

Exhibit "A"

# Clinical Laboratory of San Bernardino, Inc.



**Callahan & Blaine**  
3 Hutton Centre Drive, Ninth Floor  
Santa Ana CA, 92707

Project: Drinking Water  
Sub Project: [REDACTED]  
Project Manager: [REDACTED]

Work Order: 13H1419  
Received: 08/16/13 11:55  
Reported: 09/03/13

**Irving**

**13H1419-01 (Water)**

**Sample Date: 08/16/13 8:00 Sampler: Nick Panchev**

Analyte	Method	Result	Units	Rep. Limit	MDL	MCL	Prepared	Analyzed	Batch	Qualifier
<b>Metals</b>										
Arsenic (As)	SM3113-B	30	ug/L	2.0	0.68	10	08/22/13	08/22/13	1334349	
Chromium (+6)	EPA 218.6	1.3	ug/L	1.0	0.14		08/16/13	08/19/13	1334014	
<b>Radiochemistry Analyses</b>										
Gross Beta	EPA 900.0	15	pCi/L	4.0		50	08/19/13	08/26/13	1330379	
Gross Beta Counting Error	EPA 900.0	3.2	pCi/L				08/19/13	08/26/13	1330379	
Gross Beta Min Det Activity	EPA 900.0	2.2	pCi/L				08/19/13	08/26/13	1330379	
Uranium	EPA 908.0	70	pCi/L	1.0		20	08/20/13	08/20/13	1333313	
Uranium Counting Error	EPA 908.0	3.5	pCi/L				08/20/13	08/20/13	1333313	
Uranium Min Det Activity	EPA 908.0	0.88	pCi/L				08/20/13	08/20/13	1333313	

J Detected below the Reporting Limit; reported concentration is estimated; (J-Flag)

ND Analyte NOT DETECTED at or above the MDL; Method Detection Limit


  
Robin Glenney  
Project Manager

EXHIBIT A-#  
ANNETTE A11

Page 1 of 1

# Western Environmental Testing Laboratory

## QC Report

QCBatchID	QCType	Parameter	Method	Result	Units							
QC15010189	Blank 1	Arsenic	EPA 200.8	0.0015	mg/L							
QCBatchID	QCType	Parameter	Method	Result	Actual	% Recovery	Units					
QC15010189	LCS 1	Arsenic	EPA 200.8	0.0528	0.050	106	mg/L					
QCBatchID	QCType	Parameter	Method	Spike Sample	Sample Result	MS Result	MSD Result	Spike Value	Units	MS % Rec.	MSD % Rec.	RPD
QC15010189	MS 1	Arsenic	EPA 200.8	1412779-001	ND	0.0536	0.0536	0.050	mg/L	105	105	<1%

Customer Sample ID: [REDACTED]

Collect Date/Time: 12/16/2014 16:00

WETLAB Sample ID: 1412761-002

Receive Date: 12/23/2014 13:10

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	24	µg/L	1	1.0	1/6/2015	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		1/6/2015	NV00925

Customer Sample ID: [REDACTED]

Collect Date/Time: 12/16/2014 14:00

WETLAB Sample ID: 1412761-003

Receive Date: 12/23/2014 13:10

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	740	µg/L	[REDACTED]	1.0	1/6/2015	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		1/6/2015	NV00925

Customer Sample ID: [REDACTED]

Collect Date/Time: 12/16/2014 08:45

WETLAB Sample ID: 1412761-004

Receive Date: 12/23/2014 13:10

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	37	µg/L	[REDACTED]	1.0	1/6/2015	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		1/6/2015	NV00925

DF=Dilution Factor, RL=Reporting Limit, ND=Not Detected or &lt;RL

**SPARKS**

475 E. Greg Street, Suite 119  
 Sparks, Nevada 89431  
 tel (775) 355-0202  
 fax (775) 355-0617  
 EPA LAB ID: NV00925 - ELAP No: 2523

**ELKO**

1084 Lamelle Hwy  
 Elko, Nevada 89801  
 tel (775) 777-9933  
 fax (775) 777-9933  
 EPA LAB ID: NV00926

**LAS VEGAS**

3230 Potosi Ave. Suite 4  
 Las Vegas, Nevada 89102  
 tel (702) 475-8809  
 fax (702) 622-2868  
 EPA LAB ID: NV00932

EXHIBIT "A" 6



## Certificate of Analysis

Report Date: 10/20/14 14:06

Received Date: 10/07/14 12:50

Client: Water Investigations  
848 N. Rainbow Blvd., #122  
Las Vegas, NV 89107

Turnaround Time: 6 workdays

Phone: (702) 301-4167

Fax:

P.O.#:

Attn: [REDACTED]

Project: Arsenic Testing

Dear [REDACTED]:

Enclosed are the results of analyses for samples received 10/7/2014 with the Chain of Custody document. The samples were received in good condition, at 1.3 °C and on ice. All analysis met the method criteria except as noted below or in the report with data qualifiers.

Work Order No: 4J07046-01  
Sampled by: [REDACTED]

Sample ID: #16 Brown  
Sampled: 10/04/14 10:00

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	120	[REDACTED]	ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:03	ml	W4J0456

Work Order No: 4J07046-02  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/04/14 11:30

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	76	[REDACTED]	ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:08	ml	W4J0456

Work Order No: 4J07046-03  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/04/14 10:00

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	3.9	[REDACTED]	ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:12	ml	W4J0456

Work Order No: 4J07046-04  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/04/14 13:30

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	4.8	[REDACTED]	ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:29	ml	W4J0456

Work Order No: 4J07046-05  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/04/14 14:30

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	210	[REDACTED]	ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:34	ml	W4J0456

Work Order No: 4J07046-06  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/04/14 14:45

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	11	[REDACTED]	ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:38	ml	W4J0456

Work Order No: 4J07046-07  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/04/14 16:30

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	38	[REDACTED]	ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:55	ml	W4J0456

Exhibit "A"

# Clinical Laboratory of San Bernardino, Inc.



Panchev, Nick  
25633 Anderson Ave  
Burstow CA, 92311

Project: Routine  
Sub Project: Toxic Tort Towns / Hinkley  
Project Manager: [REDACTED]

Work Order: 14H0183  
Received: 08/04/14 17:05  
Reported: 08/19/14

14H0183-01 (Water)

Sample Date: 07/28/14 10:10

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
<b>Metals</b>									
Arsenic (As)	SM3113-B	34	ug/L	2.0	10	08/11/14	08/11/14	1433025	

14H0183-02 (Water)

Sample Date: 07/28/14 10:30

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
<b>Metals</b>									
Arsenic (As)	SM3113-B	1600	ug/L	100	10	08/15/14	08/19/14	1433586	

14H0183-03 (Water)

Sample Date: 07/28/14 11:00

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
<b>Metals</b>									
Arsenic (As)	SM3113-B	34	ug/L	2.0	10	08/11/14	08/11/14	1433025	

14H0183-04 (Water)

Sample Date: 07/28/14 11:30

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
<b>Metals</b>									
Arsenic (As)	SM3113-B		ug/L	2.0	10	08/11/14	08/11/14	1433025	

14H0183-05 (Water)

Sample Date: 07/26/14 12:00

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
<b>Metals</b>									
Arsenic (As)	SM3113-B	130	ug/L	20	10	08/15/14	08/18/14	1433586	

14H0183-06 (Water)

Sample Date: 07/26/14 10:03

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
<b>Metals</b>									
Arsenic (As)	SM3113-B		ug/L	2.0	10	08/11/14	08/11/14	1433025	

14H0183-07 (Water)

Sample Date: 07/26/14 11:08

Sampler: Nick Panchev

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
<b>Metals</b>									
Arsenic (As)	SM3113-B	37	ug/L	2.0	10	08/11/14	08/11/14	1433025	

EXHIBIT A #

# Clinical Laboratory of San Bernardino, Inc.



**Callahan & Blaine**  
3 Hutton Centre Drive, Ninth Floor  
Santa Ana CA, 92707

Project: Drinking Water  
Silt Project: Irving  
Project Manager: Javier H. van Oordt

Work Order: 13H1419  
Received: 08/16/13 11:55  
Reported: 09/03/13

**Irving**


**13H1419-01 (Water)**

**Sample Date: 08/16/13 8:00 Sampler: Nick Panchev**

Analyte	Method	Result	Units	Rep. Limit	MDL	MCL	Prepared	Analyzed	Batch	Qualifier
<b>Metals</b>										
Arsenic (As)	SM3113-B	30	ug/L	2.0	0.68	10	08/22/13	08/22/13	1334349	
Chromium (+6)	EPA 218.6	1.3	ug/L	1.0	0.14		08/16/13	08/19/13	1334014	
<b>Radiochemistry Analyses</b>										
Gross Beta	EPA 900.0	15	pCi/L	4.0		50	08/19/13	08/26/13	1330379	
Gross Beta Counting Error	EPA 900.0	3.2	pCi/L				08/19/13	08/26/13	1330379	
Gross Beta Min Det Activity	EPA 900.0	2.2	pCi/L				08/19/13	08/26/13	1330379	
Uranium	EPA 908.0	70	pCi/L	1.0		20	08/20/13	08/20/13	1333313	
Uranium Counting Error	EPA 908.0	3.5	pCi/L				08/20/13	08/20/13	1333313	
Uranium Min Det Activity	EPA 908.0	0.88	pCi/L				08/20/13	08/20/13	1333313	

J Detected below the Reporting Limit; reported concentration is estimated; (J-Flag)

ND Analyte NOT DETECTED at or above the MDL; Method Detection Limit

  
Robin Glenney  
Project Manager

**EXHIBIT B-1**  
**ANNETTE A11**

Page 1 of 1

**EXHIBIT "A"**



## Certificate of Analysis

Report Date: 10/31/14 12:34  
Received Date: 10/14/14 12:15Client: Water Investigations  
[REDACTED] Blvd., #122  
Las Vegas, NV 89107

Turnaround Time: Normal

Phone: (702) 301-4167

Fax: [REDACTED]

P.O. # [REDACTED]

Attn: [REDACTED]

Project: Drinking water

Dear [REDACTED]:

Enclosed are the results of analyses for samples received 10/14/2014 with the Chain of Custody document. The samples were received in good condition, at 1.0 °C and on ice. All analysis met the method criteria except as noted below or in the report with data qualifiers.

Work Order No: 4J14041-01  
Sampled by: [REDACTED]Sample ID: #61 Velasquez  
Sampled: 10/13/14 09:30Matrix: Water  
Sample Note: [REDACTED]

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	54		ug/l	0.40	1	EPA 200.8	10/23/14 11:46	10/24/14 16:01	ml	W4J1182

Work Order No: 4J14041-02  
Sampled by: [REDACTED]Sample ID: #58 Matsue  
Sampled: 10/13/14 10:00Matrix: Water  
Sample Note: [REDACTED]

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	150		ug/l	0.40	1	EPA 200.8	10/23/14 11:46	10/24/14 16:05	ml	W4J1182

Work Order No: 4J14041-03  
Sampled by: [REDACTED]Sample ID: #29 David Matthiesen  
Sampled: 10/13/14 11:00Matrix: Water  
Sample Note: [REDACTED]

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	20		ug/l	0.40	1	EPA 200.8	10/23/14 11:46	10/24/14 16:09	ml	W4J1182

Work Order No: 4J14041-04  
Sampled by: [REDACTED]Sample ID: #11 Hawes  
Sampled: 10/13/14 11:30Matrix: Water  
Sample Note: [REDACTED]

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	79		ug/l	0.40	1	EPA 200.8	10/23/14 11:46	10/24/14 16:14	ml	W4J1182

Work Order No: 4J14041-05  
Sampled by: ClientSample ID: #30 Carrera  
Sampled: 10/13/14 12:10Matrix: Water  
Sample Note: [REDACTED]

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	5.5		ug/l	0.40	1	EPA 200.8	10/23/14 11:46	10/24/14 16:18	ml	W4J1182

Work Order No: 4J14041-06  
Sampled by: [REDACTED]Sample ID: #11 Hawes  
Sampled: 10/13/14 12:50Matrix: Water  
Sample Note: [REDACTED]

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium Rad.	12		pCi/L	0.13	1	EPA 200.8	10/23/14 11:51	10/24/14 17:23	ml	W4J1183

Work Order No: 4J14041-07  
Sampled by: [REDACTED]Sample ID: #11 Hawes  
Sampled: 10/13/14 16:00Matrix: Water  
Sample Note: [REDACTED]

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium 6+	ND		ug/l	0.30	1	EPA 218.6	10/16/14 09:50	10/16/14 19:38	hmt	W4J0792

Case Narrative:

Lab#: 4J14041-07

Page 1 of 2

Exhibit "A"



## Certificate of Analysis

Report Date: 10/20/14 14:06

Received Date: 10/07/14 12:50

Client: Water Investigations  
848 N. Rainbow Blvd., #122  
Las Vegas, NV 89107

Turnaround Time: 6 workdays

Phone: [REDACTED]

Fax: [REDACTED]

P.O.#: [REDACTED]

Attn: [REDACTED]

Project: Arsenic Testing

Dear Jack Rosen :

Enclosed are the results of analyses for samples received 10/7/2014 with the Chain of Custody document. The samples were received in good condition, at 1.3 °C and on ice. All analysis met the method criteria except as noted below or in the report with data qualifiers.

Work Order No: 4J07046-01  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/04/14 10:00

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	120		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:03	ml	W4J0456

Work Order No: 4J07046-02  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/04/14 11:30

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	76		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:08	ml	W4J0456

Work Order No: 4J07046-03  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/04/14 13:00

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	3.9		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:12	ml	W4J0456

Work Order No: 4J07046-04  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/04/14 13:30

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	4.8		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:29	ml	W4J0456

Work Order No: 4J07046-05  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/04/14 14:30

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	210		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:34	ml	W4J0456

Work Order No: 4J07046-06  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/04/14 14:45

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	11		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:38	ml	W4J0456

Work Order No: 4J07046-07  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/04/14 16:30

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	38		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:55	ml	W4J0456

Exhibit "A"





## Certificate of Analysis

Report Date: 10/20/14 14:06

Received Date: 10/07/14 12:50

Client: Water Investigations  
848 N. Rainbow Blvd., #122  
Las Vegas, NV 89107

Turnaround Time: 6 workdays

Phone: (702) 301-4167

Fax:

P.O.#:

Attn: [REDACTED]

Project: Arsenic Testing

Dear [REDACTED]:

Enclosed are the results of analyses for samples received 10/7/2014 with the Chain of Custody document. The samples were received in good condition, at 1.3 °C and on ice. All analysis met the method criteria except as noted below or in the report with data qualifiers.

Work Order No: 4J07046-01  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/04/14 10:00

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	120		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:03	ml	W4J0456

Work Order No: 4J07046-02  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/04/14 11:30

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	76		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:08	ml	W4J0456

Work Order No: 4J07046-03  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/04/14 13:00

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	3.9		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:12	ml	W4J0456

Work Order No: 4J07046-04  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/04/14 13:30

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	4.8		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:29	ml	W4J0456

Work Order No: 4J07046-05  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/04/14 14:30

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	210		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:34	ml	W4J0456

Work Order No: 4J07046-06  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/04/14 14:45

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	11		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:38	ml	W4J0456

Work Order No: 4J07046-07  
Sampled by: [REDACTED]

Sample ID: [REDACTED]  
Sampled: 10/04/14 16:30

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Arsenic, Total	38		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 15:55	ml	W4J0456

CONTINUE - see page 2

Exhibit 'A'



## Certificate of Analysis

Order No: 4J07046-08  
Impiled by: Jack RosenSample ID: #57 Ornelas  
Sampled: 10/04/14 12:10Matrix: Water  
Sample Note:

anlyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
senic, Total	140		ug/l	0.40	1	EPA 200.8	10/09/14 10:20	10/16/14 16:00	ml	W4J0456

## Case Narrative:

Authorized Signature

Contact:   
(Project Manager)ELAP # 1132  
LACSD # 10143  
NELAC # 04229CA

The results in this report apply to the samples analyzed in accordance with the chain of custody document. Weck Laboratories certifies that the test results meet all requirements of NELAC unless noted in the Case Narrative. This analytical report must be reproduced in its entirety.

## Notes:

The Chain of Custody document is part of the analytical report.

Any remaining sample(s) for testing will be disposed of one month from the final report date unless other arrangements are made in advance.

All results are expressed on wet weight basis unless otherwise specified.

If NOT DETECTED at or above the Reporting Limit. If J-value reported, then NOT DETECTED at or above the Method Detection Limit (MDL).

If Not Reportable

Sub = Subcontracted analysis, original report enclosed.

An Absence of Total Coliform meets the drinking water standards as established by the State of California Department of Health Services.

The Reporting Limit (RL) is referenced as laboratory's Practical Quantitation Limit (PQL).

For Potable water analysis, the Reporting Limit (RL) is referenced as Detection Limit for reporting purposes (DLRs) defined by EPA.

If sample collected by Weck Laboratories, sampled in accordance to lab SOP MIS002

Exhibit "A"



WECK LABORATORIES, INC.

Analytical Laboratory Service - Since 1964

## Certificate of Analysis

Report Date: 09/09/14 08:37

Received Date: 08/28/14 13:32

Client: Water Investigations  
848 N. Rainbow Blvd., #122  
Las Vegas, NV 89107

Turnaround Time: Normal

Phone: (702) 301-4167

Fax:

P.O.#:

Attn: [REDACTED]

Project:

Dear [REDACTED]:

Enclosed are the results of analyses for samples received 8/28/2014 with the Chain of Custody document. The samples were received in good condition, at 4.9 °C. All analysis met the method criteria except as noted below or in the report with data qualifiers.

Work Order No: 4H28040-01  
Sampled by: [REDACTED]

Sample ID: Chromium (VI) #7  
Sampled: 08/27/14 16:20

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Chromium 6+	1.9		ug/l	0.30	1	EPA 218.6	09/03/14 10:00	09/03/14 13:37	owh	W410098

Work Order No: 4H28040-02  
Sampled by: [REDACTED]

Sample ID: Uranium #7  
Sampled: 08/27/14 11:10

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	8.5		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:40	ml	W410209

Work Order No: 4H28040-03  
Sampled by: [REDACTED]

Sample ID: Uranium #19  
Sampled: 08/27/14 11:30

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	48		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:42	ml	W410209

Work Order No: 4H28040-04  
Sampled by: [REDACTED]

Sample ID: Uranium #35  
Sampled: 08/27/14 11:50

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	17		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:45	ml	W410209

Work Order No: 4H28040-05  
Sampled by: [REDACTED]

Sample ID: Uranium #39  
Sampled: 08/27/14 12:15

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	16		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:47	ml	W410209

Work Order No: 4H28040-06  
Sampled by: [REDACTED]

Sample ID: Uranium #28  
Sampled: 08/27/14 12:35

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	19		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 14:59	ml	W410209

Work Order No: 4H28040-07  
Sampled by: [REDACTED]

Sample ID: Uranium #21  
Sampled: 08/27/14 13:00

Matrix: Water  
Sample Note:

Analyte	Result	Qualifier	Units	RL	Dil	Method	Prepared	Analyzed	Analyst	Batch
Uranium, Total	30		ug/l	0.20	1	EPA 200.8	09/04/14 12:13	09/08/14 15:14	ml	W410209

Lab#: 4H28040-09

Page 1 of 2

Exhibit "A"

# Western Environmental Testing Laboratory Analytical Report

Contaminated Realty  
848 N. Rainbow Blvd. #1422  
Las Vegas, NV 89107

Attn: [REDACTED]

Phone: (702) 301-4167 Fax:

PO/Project: 31411074/TOSIC TORT TOWNS

Date Printed: 12/5/2014

OrderID: 1411453

Customer Sample ID: HAWES #11

Collect Date/Time: 11/13/2014 13:05

WETLAB Sample ID: 1411453-001

Receive Date: 11/17/2014 15:00

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	57	µg/L	1	1.0	12/1/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		12/1/2014	NV00925

Customer Sample ID: [REDACTED]

Collect Date/Time: 11/13/2014 15:30

WETLAB Sample ID: 1411453-002

Receive Date: 11/17/2014 15:00

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	46	µg/L	1	1.0	12/1/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		12/1/2014	NV00925

Customer Sample ID: [REDACTED]

Collect Date/Time: 11/13/2014 14:00

WETLAB Sample ID: 1411453-003

Receive Date: 11/17/2014 15:00

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	9.8	µg/L	1	1.0	12/1/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		12/1/2014	NV00925

Customer Sample ID: [REDACTED]

Collect Date/Time: 11/13/2014 15:00

WETLAB Sample ID: 1411453-004

Receive Date: 11/17/2014 15:00

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	19	µg/L	1	1.0	12/1/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		12/1/2014	NV00925

DF=Dilution Factor, RL=Reporting Limit, ND=Not Detected or <RL

Page 3 of 5

## SPARKS

475 E. Greg Street, Suite 119  
Sparks, Nevada 89431  
tel (775) 455-0882  
fax (775) 455-0817  
EPA LAB ID: NV00925 - ELAP No: 8523

## ELKO

708 E. Lemmon Hwy.  
Elko, Nevada 89801  
tel (775) 377-0968  
fax (775) 377-0938  
EPA LAB ID: NV00925

## LAS VEGAS

3280 Potters Ave. Suite 4  
Las Vegas, Nevada 89102  
tel (702) 475-8888  
fax (702) 422-2888  
EPA LAB ID: NV00925

Exhibit "A"

Customer Sample ID: [REDACTED]

Collect Date/Time: 11/1/2014 13:45

WETLAB Sample ID: 1411054-005

Receive Date: 11/3/2014 11:45

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	210	µg/L	1	1.0	11/14/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		11/12/2014	NV00925

Customer Sample ID: Hinkley, [REDACTED]

Collect Date/Time: 11/1/2014 14:40

WETLAB Sample ID: 1411054-008

Receive Date: 11/3/2014 11:45

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	80	µg/L	1	1.0	11/14/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		11/12/2014	NV00925

Customer Sample ID: Hinkley, [REDACTED]

Collect Date/Time: 11/1/2014 16:40

WETLAB Sample ID: 1411054-012

Receive Date: 11/3/2014 11:45

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	150	µg/L	1	1.0	11/14/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		11/12/2014	NV00925

Customer Sample ID: Hinkley, [REDACTED]

Collect Date/Time: 11/1/2014 18:00

WETLAB Sample ID: 1411054-013

Receive Date: 11/3/2014 11:45

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	14	µg/L	1	1.0	11/14/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		11/12/2014	NV00925

Customer Sample ID: Hinkley, [REDACTED]

Collect Date/Time: 11/1/2014 17:30

WETLAB Sample ID: 1411054-014

Receive Date: 11/3/2014 11:45

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	58	µg/L	1	1.0	11/14/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		11/12/2014	NV00925

DF=Dilution Factor, RL=Reporting Limit, ND=Not Detected or &lt;RL

Page 5 of 6

**SPARKS**

475 E. Greg Street, Suite 119  
 Sparks, Nevada 89431  
 tel (775) 355-0202  
 fax (775) 355-0817  
 EPA LAB ID: NV00925 - ELAP No: 2523

**ELKO**

1084 Lamoille Hwy  
 Elko, Nevada 89801  
 tel (775) 777-9933  
 fax (775) 777-9933  
 EPA LAB ID: NV00925

**LAS VEGAS**

3230 Polaris Ave. Suite 4  
 Las Vegas, Nevada 89102  
 tel (702) 475-8889  
 fax (702) 622-2868  
 EPA LAB ID: NV00925

Exhibit "A"

Customer Sample ID: Hinkley, [REDACTED]

Collection Date: 11/1/2014 13:45

WETLAB Sample ID: 1411054-005

Receive Date: 11/3/2014 11:45

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	210	µg/L	1	1.0	11/14/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		11/12/2014	NV00925

Customer Sample ID: Hinkley, [REDACTED]

Collection Date: 11/1/2014 14:40

WETLAB Sample ID: 1411054-008

Receive Date: 11/3/2014 11:45

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	80	µg/L	1	1.0	11/14/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		11/12/2014	NV00925

Customer Sample ID: Hinkley, [REDACTED]

Collection Date: 11/1/2014 16:40

WETLAB Sample ID: 1411054-012

Receive Date: 11/3/2014 11:45

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	150	µg/L	1	1.0	11/14/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		11/12/2014	NV00925

Customer Sample ID: Hinkley, CA [REDACTED]

Collection Date: 11/1/2014 18:00

WETLAB Sample ID: 1411054-013

Receive Date: 11/3/2014 11:45

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	14	µg/L	1	1.0	11/14/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		11/12/2014	NV00925

Customer Sample ID: Hinkley, CA [REDACTED]

Collection Date: 11/1/2014 17:30

WETLAB Sample ID: 1411054-014

Receive Date: 11/3/2014 11:45

Analyte	Method	Results	Units	DF	RL	Analyzed	LabID
<u>Trace Metals by ICP-MS</u>							
Arsenic	EPA 200.8	58	µg/L	1	1.0	11/14/2014	NV00925
<u>Sample Preparation</u>							
Trace Metals Digestion	EPA 200.2	Complete		1		11/12/2014	NV00925

DF=Dilution Factor, RL=Reporting Limit, ND=Not Detected or &lt;RL

Page 5 of 6

**SPARKS**

475 E. Greg Street, Suite 119  
 Sparks, Nevada 89431  
 tel (775) 355-0202  
 fax (775) 355-0617  
 EPA LAB ID: NV00925 - ELAP No: 2523

**ELKO**

1084 Lamoille Hwy  
 Elko, Nevada 89801  
 tel (775) 777-9933  
 fax (775) 777-9933  
 EPA LAB ID: NV00926

**LAS VEGAS**

3230 Polaris Ave. Suite 4  
 Las Vegas, Nevada 89102  
 tel (702) 476-8669  
 fax (702) 622-2868  
 EPA LAB ID: NV00932

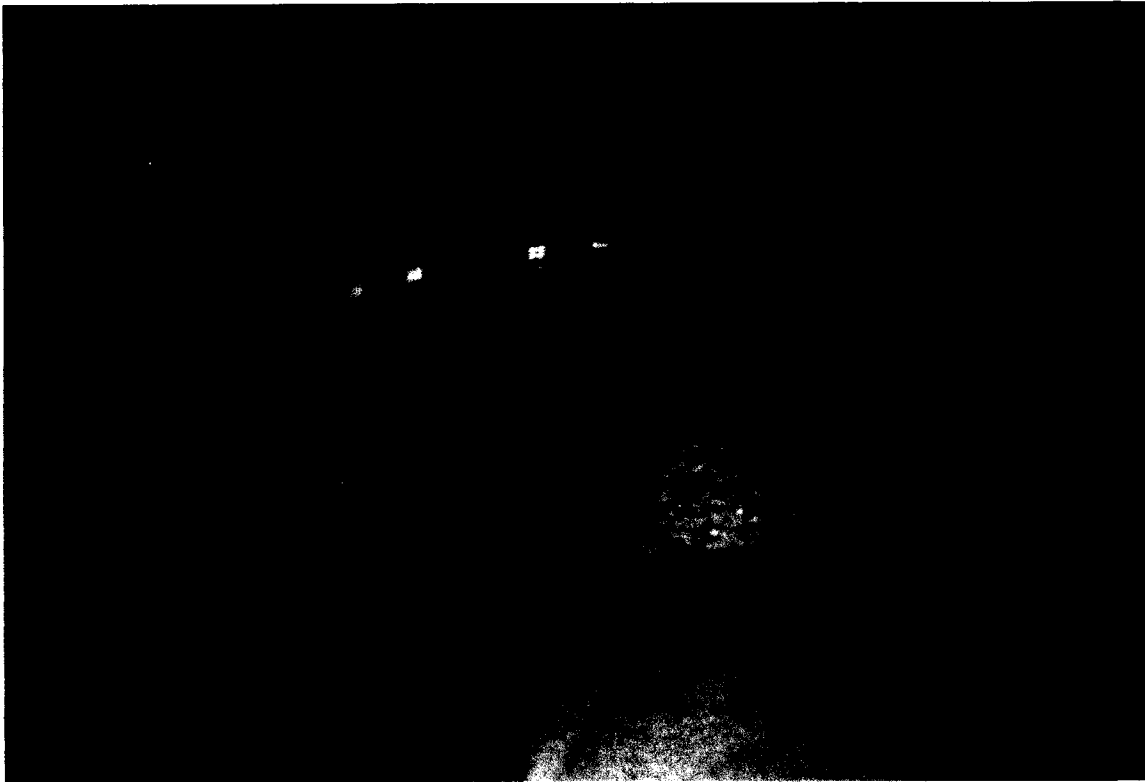
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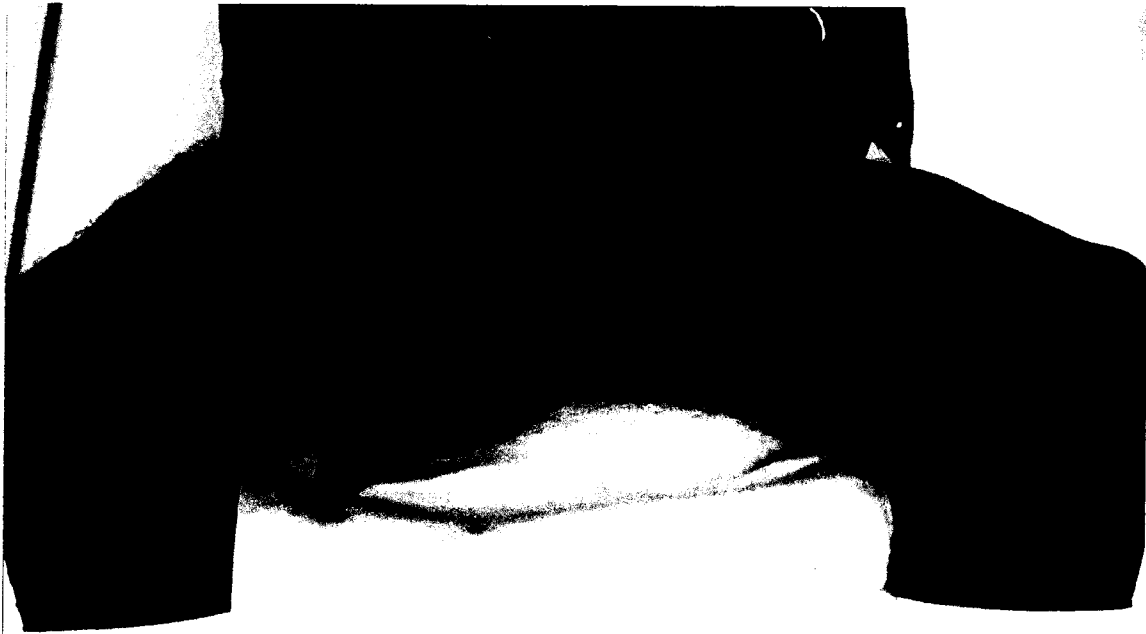
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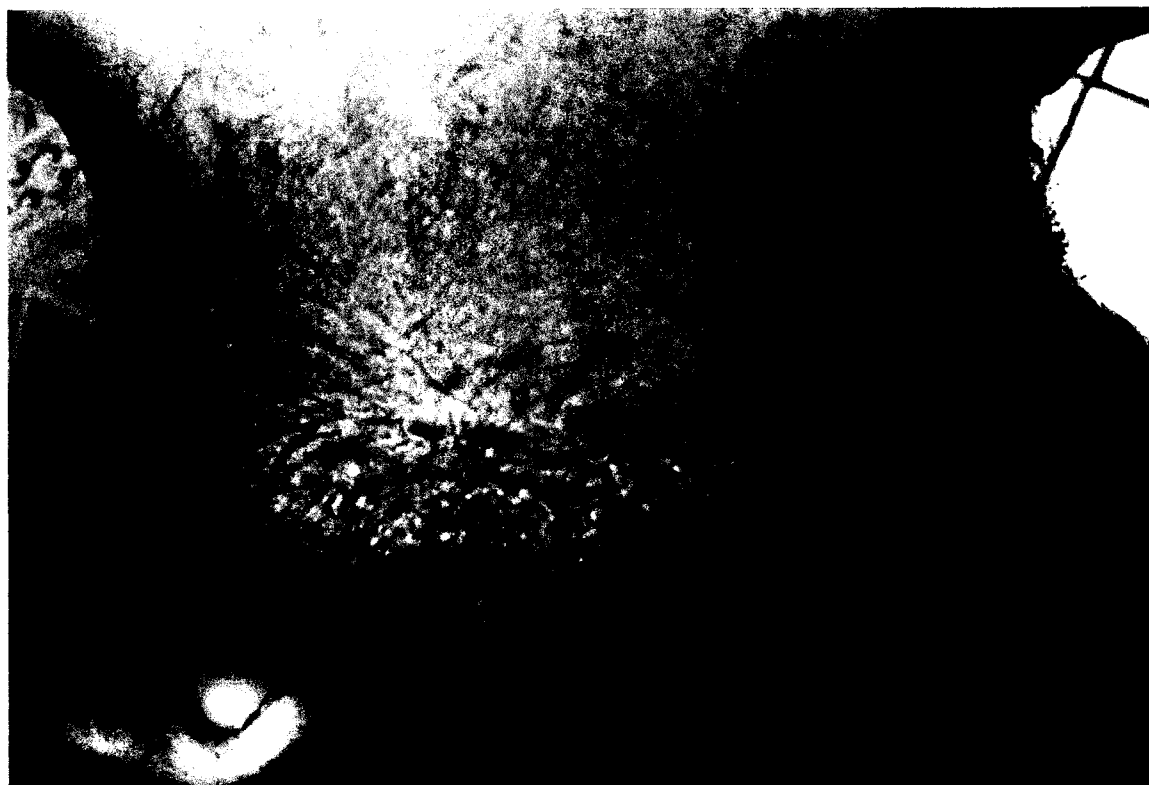








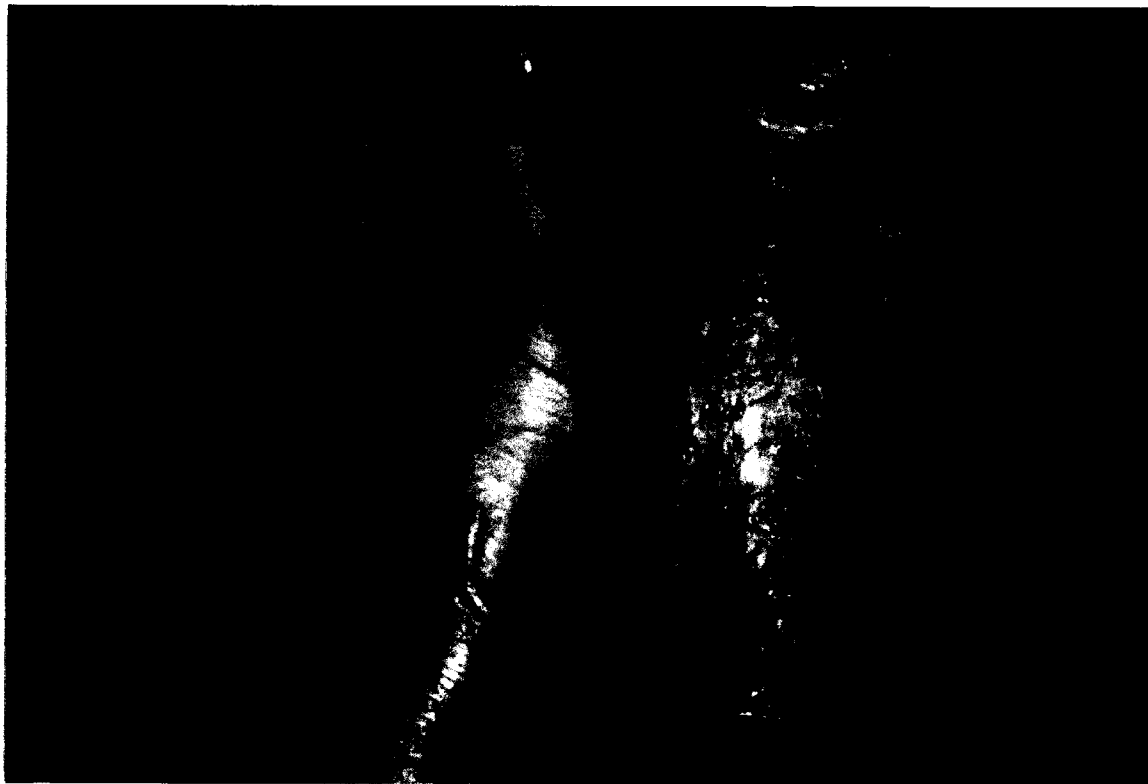


















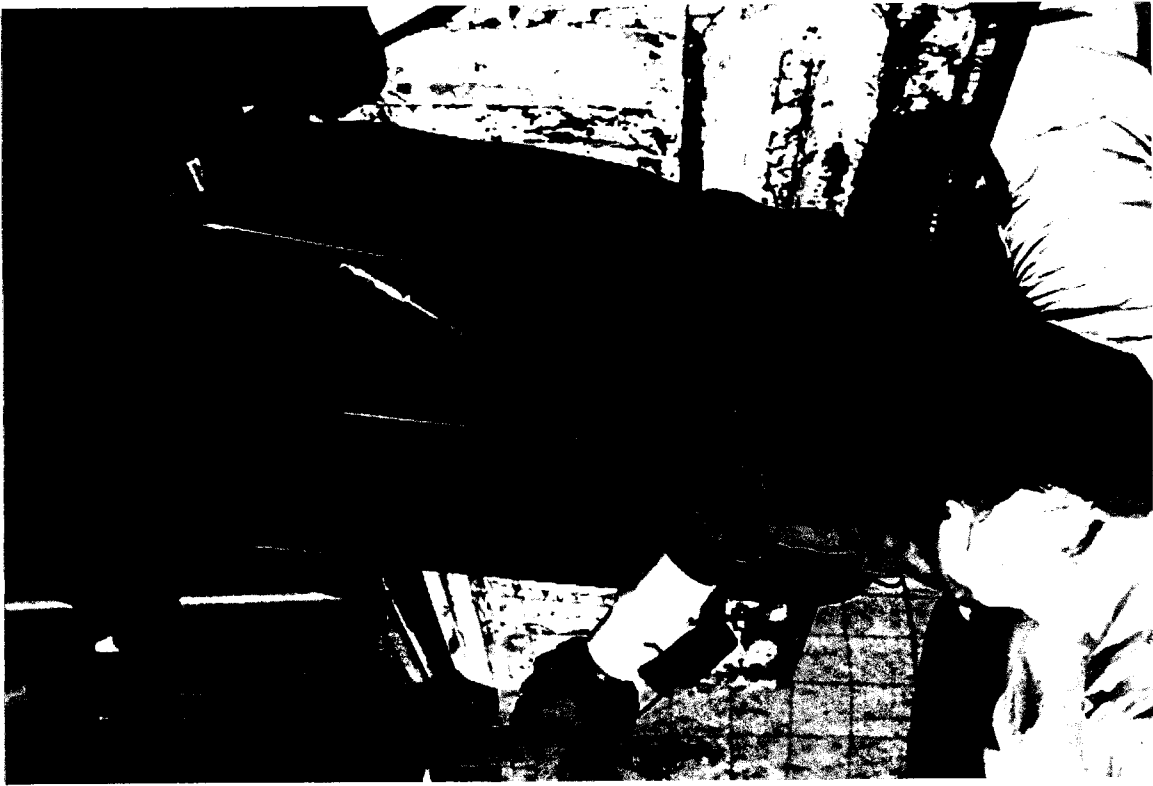




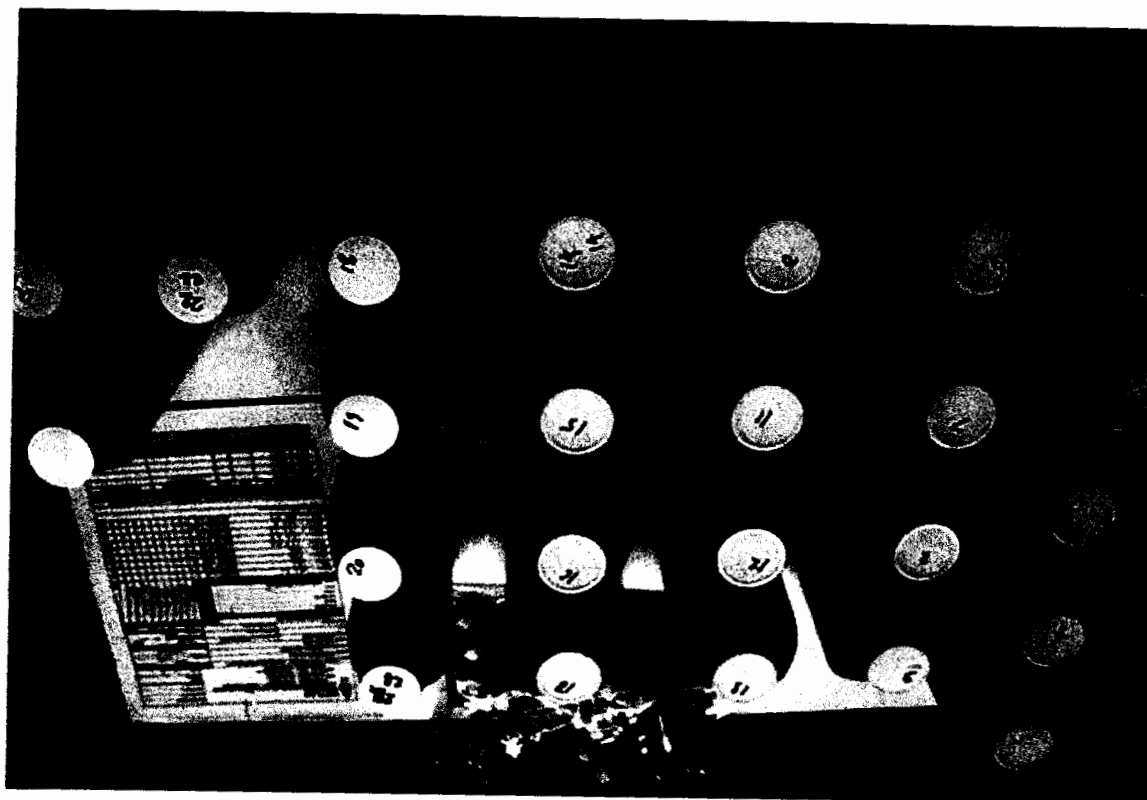
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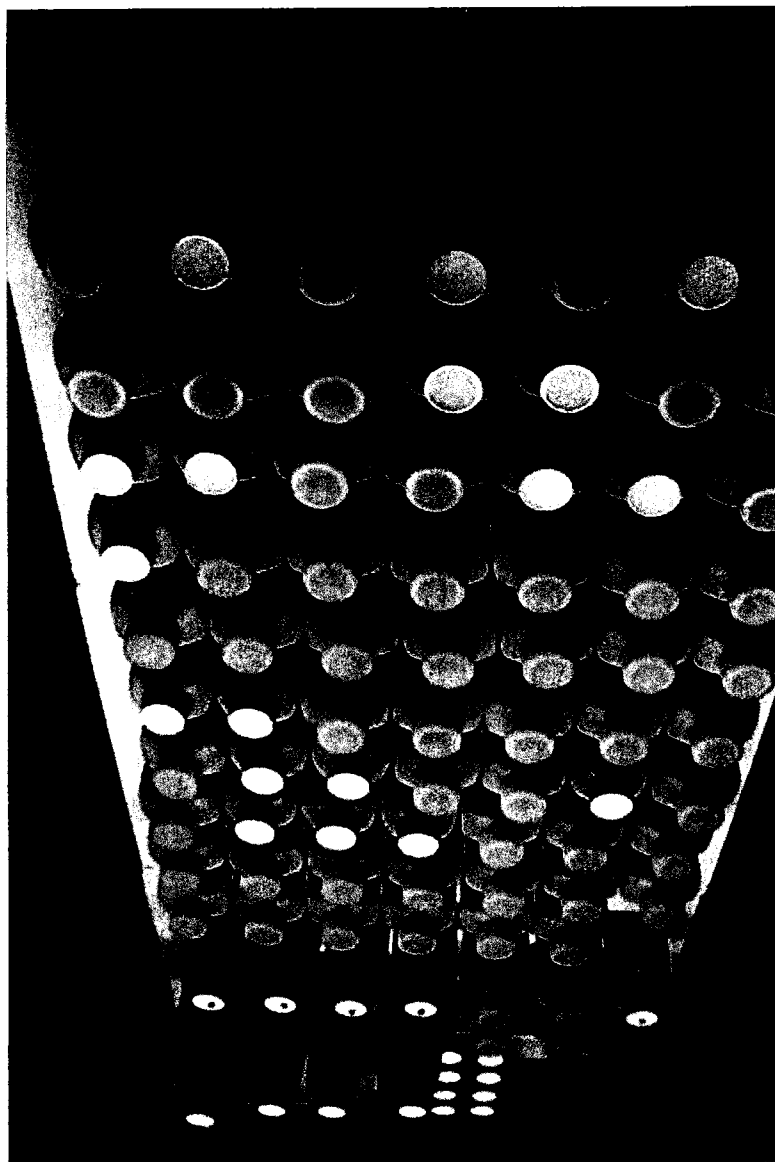










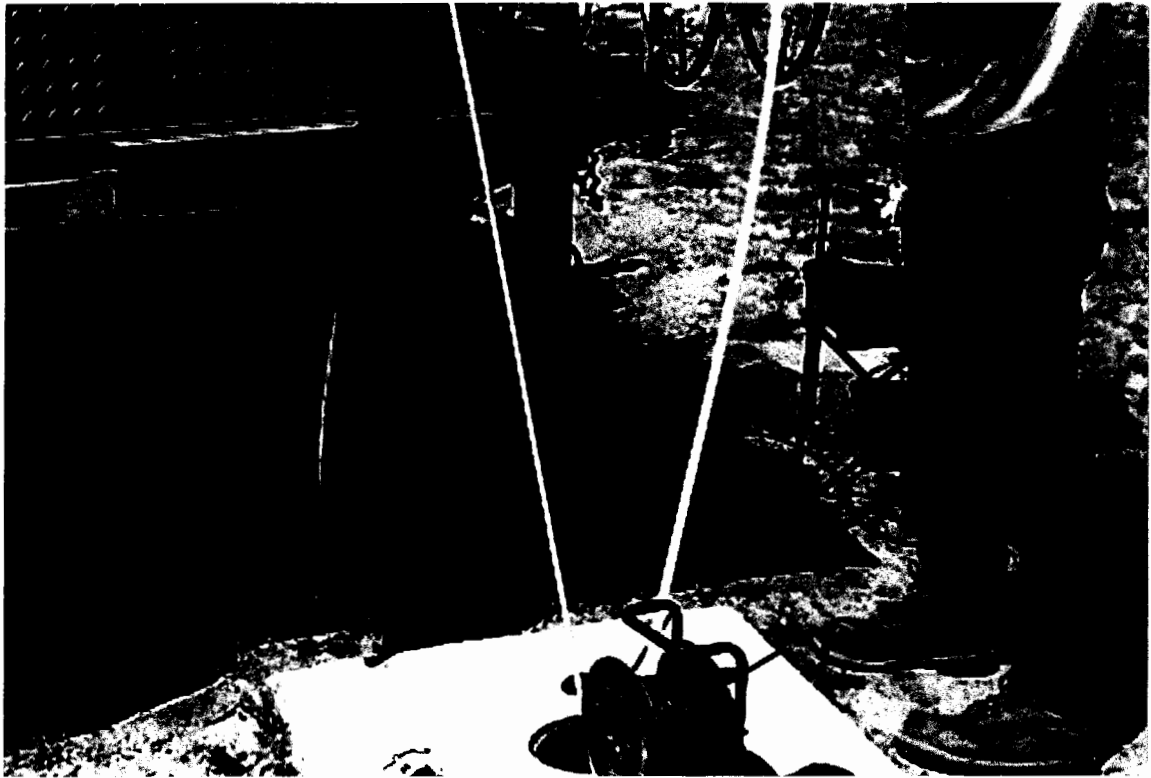
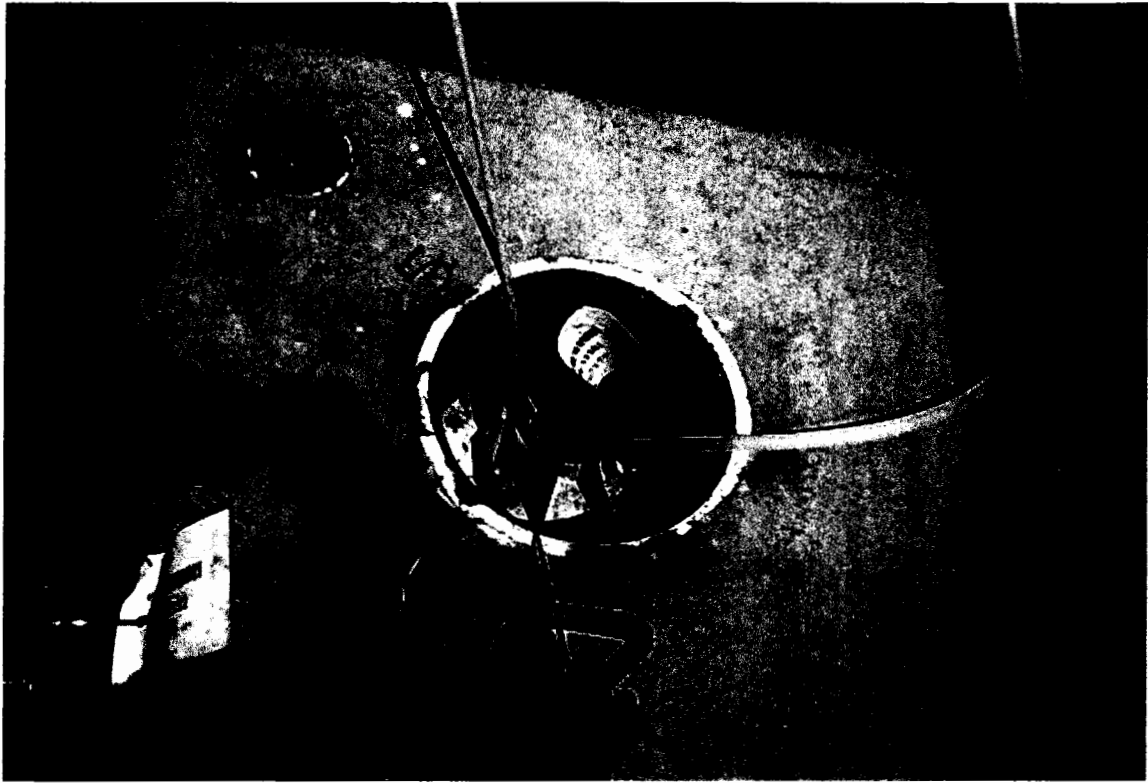


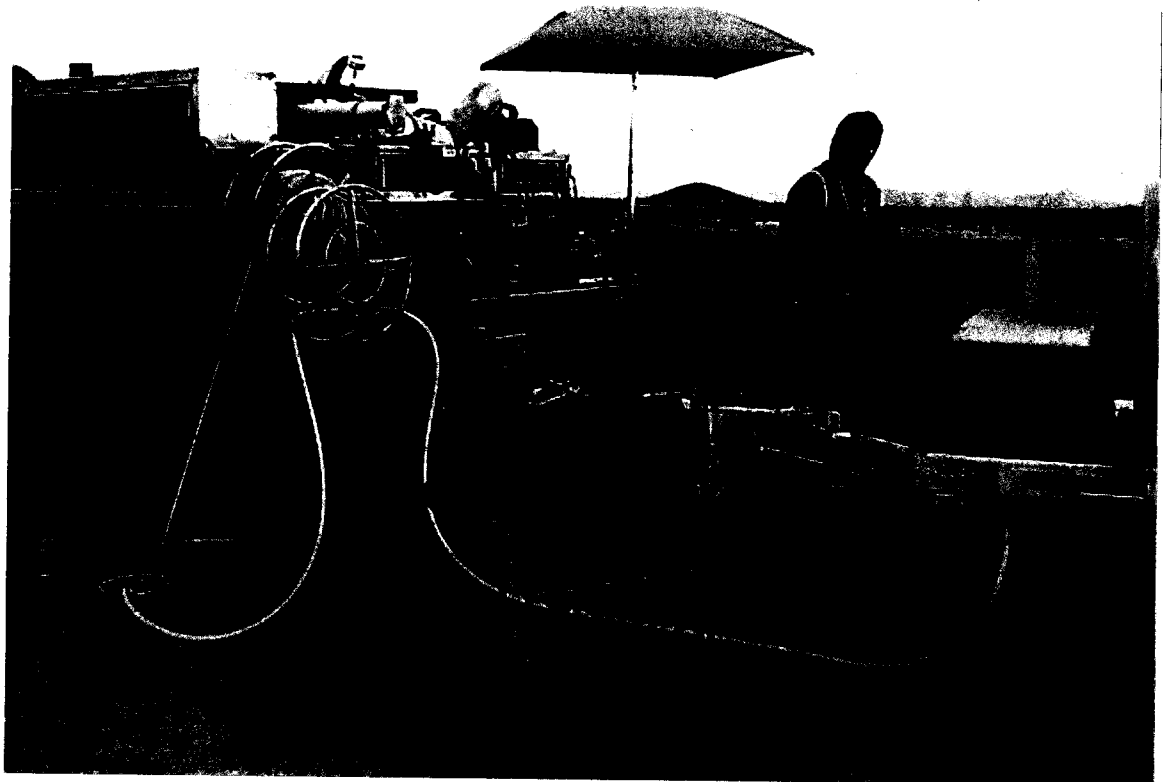
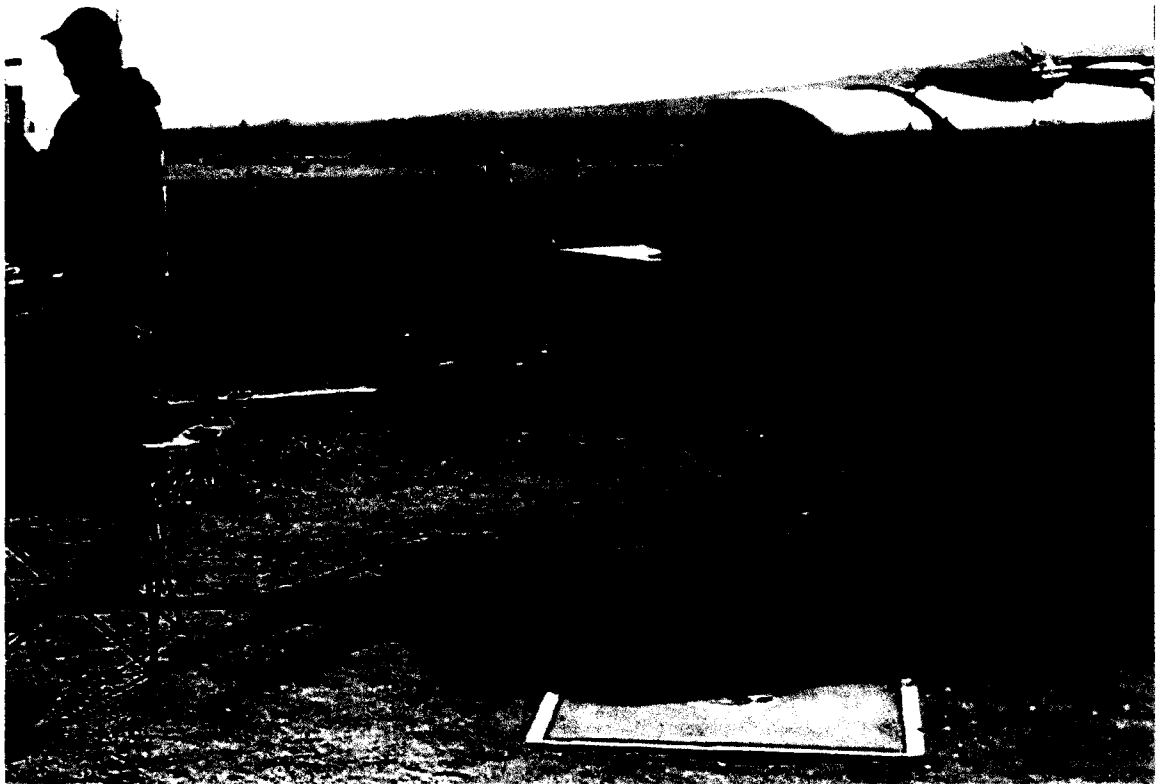




# EXHIBIT "G"









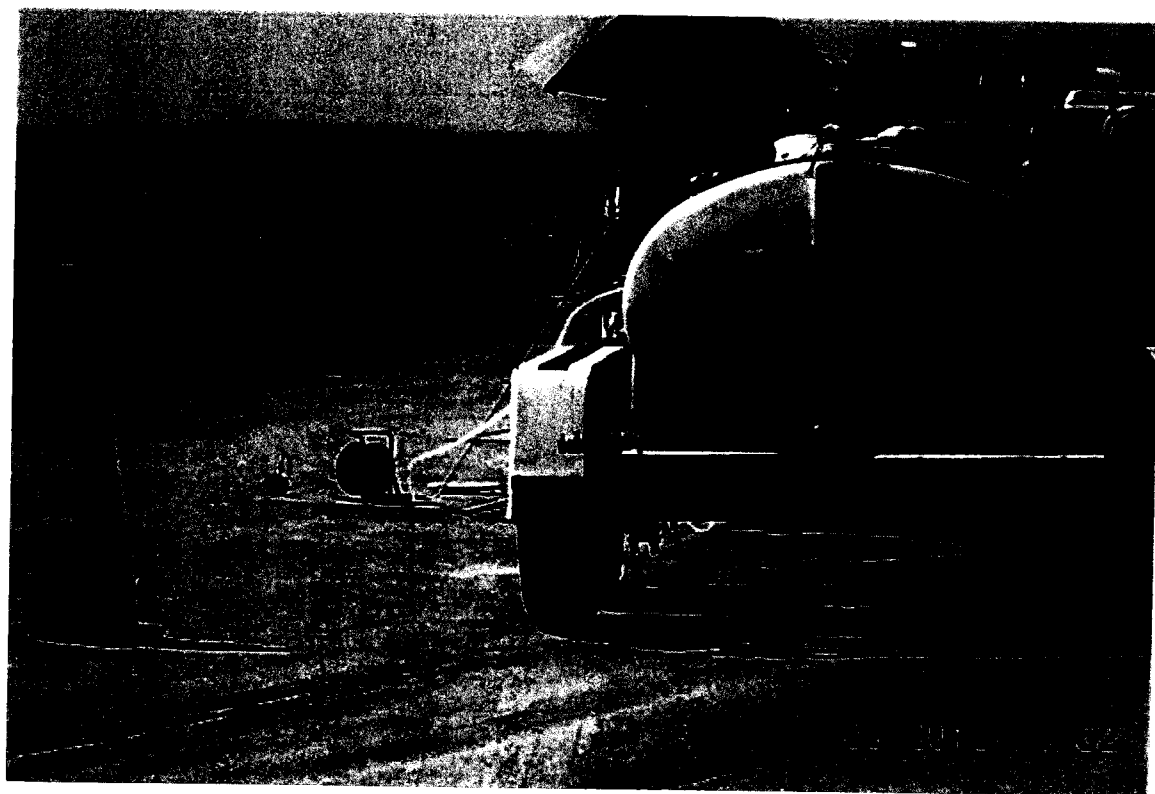
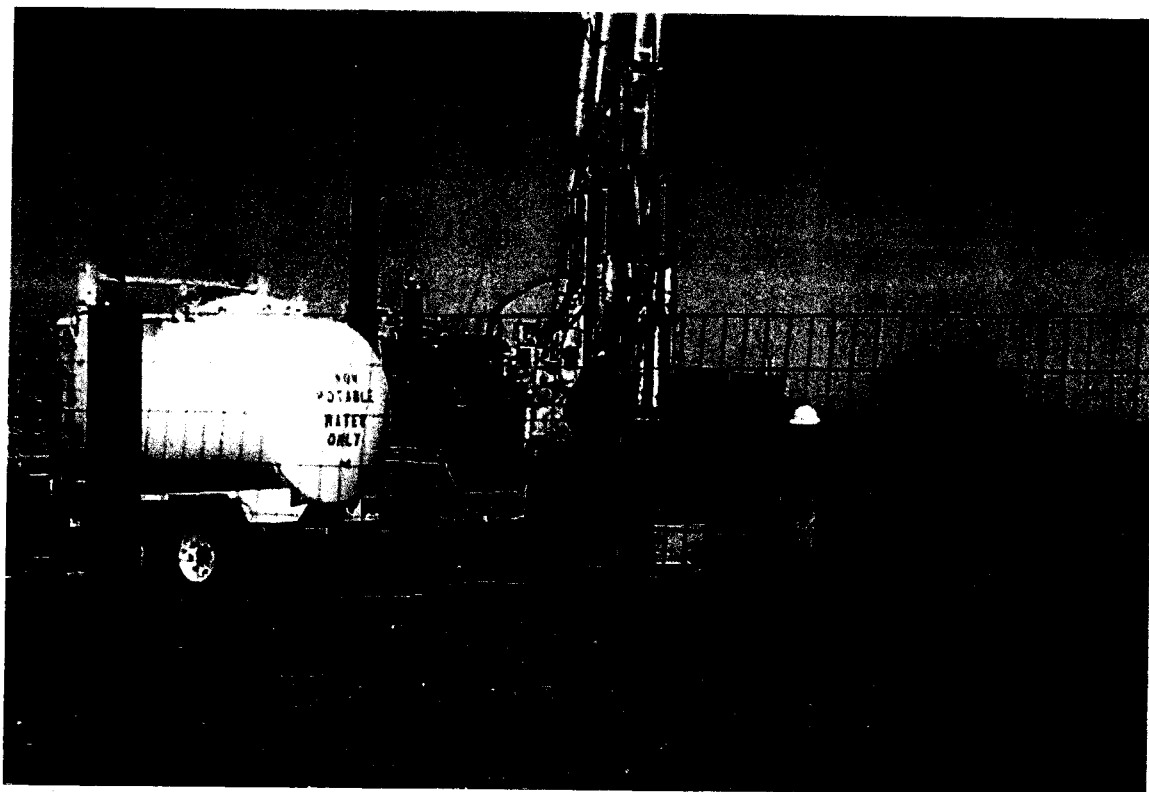




EXHIBIT “H”



VICTIMS TOWN OF HINKLEY

Temporary Mailing Address

Attn: [REDACTED] for ET AL

[REDACTED]  
Pahrump, NV 89048

TRANSMITTAL

Dated: June 26, 2015 [REDACTED]

OGWDW - 4601M

Office of Ground Water and Drinking Water  
U. S. EPA Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Attached hereto and incorporated for future reference are:

1. Request for Immediate Investigation by FBI
2. Second Request for Immediate Investigation by FBI
3. Victims From Hinkley, CA 92347 (Signature's Pages)
4. Mailing List
5. The Victims From Hinkley, CA 92347 to Local FBI Office
6. The Victims From Hinkley, CA 92347 to Local FBI Office (Second Set)
7. EVIDENTIARY EXHIBITS COVER PAGE
8. Exhibit "1": Notice to PG&E's Counsel by Relatives
9. Exhibit "2": Pacific Gas and Electric Company's Memorandum of P&A
10. Exhibit "3": Pacific Gas and Electric Company's Amended Memorandum of P&A
11. Exhibit "4": Letter to the Honorable Leandra R. Kriger, Supreme Court Justice
12. Exhibit "A": Poisoned Aquifers With Arsenic and Uranium, Entire Town of Hinkley, CA 92347
13. Exhibit "B": FACTS 0 About Aquifers, Arsenic, Uranium, other constituents
14. Exhibit "C": Facts About Poisoned Drinking Water Within The Aquifers beneath Hinkley, CA
15. Exhibit "D": Test Results by Three Analytical Laboratories – Poisoned drinking Water
16. Exhibit "E": Photographs of Victims, Hinkley, CA 92347, poisoned with Arsenic-Uranium
17. Exhibit "F": Photographs of the People from Hinkley, taking water samples from Aquifers
18. Exhibit "G": Photographs of PG&E taking water samples from Monitoring Wells and others

VICTIMS TOWN OF HINKLEY

Temporary Mailing Address

Attn: [REDACTED] for ET AL

[REDACTED]  
Pahrump, NV 89048

TRANSMITTAL

Dated: June 26, 2015 [REDACTED]

The Honorable Dianne Feinstein, Senator  
United States Senate Committee on the Judiciary  
224 Dirksen Senate Office Building,  
Washington, D.C. 20510-6050

Attached hereto and incorporated for future reference are:

1. Request for Immediate Investigation by FBI
2. Second Request for Immediate Investigation by FBI
3. Victims From Hinkley, CA 92347 (Signature's Pages)
4. Mailing List
5. The Victims From Hinkley, CA 92347 to Local FBI Office
6. The Victims From Hinkley, CA 92347 to Local FBI Office (Second Set)
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VICTIMS TOWN OF HINKLEY

Temporary Mailing Address

Attn: [REDACTED] for ET AL

[REDACTED]  
Pahrump, NV 89048

TRANSMITTAL

Dated: June 26, 2015 [REDACTED]

Attn: Bill L. Lewis; Kendrick D. Williams;  
Terry Wade; Joseph O. Johns; Patrick Bohrer  
FBI Investigation Division  
11000 Wilshire Boulevard, Suite 1700  
Los Angeles, CA 90024

Attached hereto and incorporated for future reference are:

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VICTIMS TOWN OF HINKLEY

Temporary Mailing Address

Attn: [REDACTED] for ET AL

[REDACTED]  
Pahrump, NV 89048

TRANSMITTAL

Dated: June 26, 2015 [REDACTED]

California Environmental Protection Agency  
Cal/EPA Law Enforcement and Counsel Office  
1001 "I" Street  
Sacramento, California 95814

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VICTIMS TOWN OF HINKLEY

Temporary Mailing Address

Attn: [REDACTED] for ET AL

[REDACTED]  
Pahrump, NV 89048

TRANSMITTAL

Dated: June 26, 2015 [REDACTED]  
[REDACTED]

Office of Environmental Health Hazard  
Assessment (OEHHA) Prop 65 ARSENIC  
Attn: Cynthia Oshita, (Disclosure)  
P.O. Box 4010  
Sacramento, California 95812

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VICTIMS TOWN OF HINKLEY

Temporary Mailing Address

Attn: [REDACTED] for ET AL

[REDACTED]  
Pahrump, NV 89048

TRANSMITTAL

Dated: June 26, 2015 [REDACTED]

Hon. Jerry Hill, Chair  
California Senate EQC Oversight  
State Capitol, Room 2205  
Sacramento, California 95814

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VICTIMS TOWN OF HINKLEY

Temporary Mailing Address

Attn: [REDACTED] for ET AL

[REDACTED]  
Pahrump, NV 89048

TRANSMITTAL

Dated: June 26, 2015 [REDACTED]

Hon. Luis A. Alejo, Assembly Member  
Environmental Safety and  
Toxic Materials Committee  
1020 N Street, Room 171  
Sacramento, California 95814

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VICTIMS TOWN OF HINKLEY

Temporary Mailing Address

Attn: [REDACTED] for ET AL

[REDACTED]  
Pahrump, NV 89048

TRANSMITTAL

Dated: June 26, 2013 [REDACTED]

Attn: Gary Edward Tavetian, Esq.  
Supervising Deputy Attorney General  
OFFICE OF THE ATTORNEY GENERAL, DOJ  
Natural Resources Law Section  
300 S. Spring Street, #5000  
Los Angeles, California 90013

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VICTIMS TOWN OF HINKLEY

Temporary Mailing Address

Attn: [REDACTED] for ET AL

[REDACTED]  
Pahrump, NV 89048

TRANSMITTAL

Dated: June 26, 2013 [REDACTED]

Ross Sevy, District Director  
Office of Jay Obernolte, Assemblyman  
5900 Smoke Tree Street, Suite 125  
Hesperia, California 92345

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VICTIMS TOWN OF HINKLEY

Temporary Mailing Address

Attn: [REDACTED] for ET AL

[REDACTED]  
Pahrump, NV 89048

TRANSMITTAL

Dated: June 26, 2015 [REDACTED]

Proposition 65 Enforcement Reporting  
Attention: Prop 65 Coordinator  
1515 Clay Street, Suite 2000  
Post Office Box 70550  
Oakland, California 94612-0550

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VICTIMS TOWN OF HINKLEY

Temporary Mailing Address

Attn: [REDACTED] for ET AL

[REDACTED]  
Pahrump, NV 89048

TRANSMITTAL

Dated: June 26, 2015 [REDACTED]

California Attorney General Office, DOJ  
Proposition 65 Enforcement Reporting  
1515 Clay Street, Suite 2000  
Oakland, California 94612-0550

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VICTIMS TOWN OF HINKLEY

Temporary Mailing Address

Attn: [REDACTED] for ET AL

[REDACTED]  
Pahrump, NV 89048

Diane Trujilo, Enforcement Agent  
CAL / EPA ENFORCEMENT  
1001 "I" Street  
Sacramento, CA 95814

TRANSMITTAL

Dated: June 26, 2015 [REDACTED]

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VICTIMS TOWN OF HINKLEY

Temporary Mailing Address

Attn: [REDACTED] for ET AL

[REDACTED]  
Pahrump, NV 89048

TRANSMITTAL

Dated: June 26, 2015 • [REDACTED]

Hon. Barbara Boxer, U.S. Senator  
U.S. Senate Committee on Environment  
112 Hart Senate Office Building  
Washington, D.C. 20510

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VICTIMS TOWN OF HINKLEY

Temporary Mailing Address

Attn: [REDACTED] for ET AL

[REDACTED]  
Pahrump, NV 89048

TRANSMITTAL

Dated: June 26, 201 [REDACTED]

Hon. Nancy Patricia D'Alesandro Pelosi  
U. S. Congresswoman  
United States House of Representatives  
233 Cannon H.O.B.  
Washington, DC 20515

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VICTIMS TOWN OF HINKLEY

Temporary Mailing Address

Attn: [REDACTED] for ET AL

[REDACTED]  
Pahrump, NV 89048

TRANSMITTAL

Dated: June 26, 2015 [REDACTED]  
[REDACTED]

Hon. Paul Cook, U.S. Congressman  
United States House of Representatives  
1222 Longworth House Office Building  
Washington, D.C. 20515-0508

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VICTIMS TOWN OF HINKLEY

Temporary Mailing Address

Attn: [REDACTED], for ET AL

[REDACTED]  
Pahrump, NV 89048

TRANSMITTAL

Dated: June 26, 2015 [REDACTED]

Attn: Julie Jordan; Dan Drazan; Tracy Back  
US EPA Criminal Investigation Division (CID)  
Los Angeles Resident Office  
600 Wilshire Blvd., Suite 900  
Los Angeles, CA 90017

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